

## **EXHIBIT A**

**COMMENTS OF THE PUBLIC RADIO REGIONAL ORGANIZATIONS**  
**as filed August 22, 2005 in MM Docket No. 99-25**  
*Regarding FM Translator and Low Power FM Protection Priorities*

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Creation of a Low Power Radio Service	)	MM Docket No. 99-25
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	)	

To: The Commission  
Attn: Media Bureau

**COMMENTS OF THE  
PUBLIC RADIO REGIONAL ORGANIZATIONS**

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## **SUMMARY**

The PRROs strongly urge the Commission to maintain the current “co-equal” priorities for FM translators and LPFMs.

Over nine (9) million persons receive their public radio through a public radio FM translator (reserved and non-reserved band translators). These public radio FM translators are local services. Local listeners rely on public radio FM translators to meet local needs. Decades of federal, state, local and individual investments in public radio FM translator services would be jeopardized or wasted if the FCC makes FM translators secondary to LPFMs. Moreover, given that all public radio expansion on reserved band FM and FM translator channels has been stymied – at every turn – for the better part of a decade, the March 2003 FM translator window provided the only opportunity to bring new public radio service (via public radio FM translators) to members of the public that urgently desired (and requested) such services to meet current local needs.

As the compelling personal stories in Appendix D demonstrate, public radio translators are the epitome of public service. Loss of any portion of public radio FM translator service would harm the public interest and disserve the goals of localism.

Finally, there are better, less draconian ways of resolving preclusion issues stemming from the “flood” of FM translator applications in the March 2003 window. The FCC can impose new measures now on the remaining frozen applications from the March 2003 filing window to resolve the congestion and preclusion issues and restrict future FM translator windows, without upsetting the apple cart by a whole-sale change with dire effects on public radio FM translators.

The PRROs urge the FCC to keep the status quo for FM translators and LPFMs.

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Eastern Public Radio (“EPR”), California Public Radio (“CPR”), Public Radio in Mid-America (“PRIMA”), Southern Public Radio (“SPR”), and Western States Public Radio (“WSPR”) (collectively, the public radio regional organizations or “PRROs”), file these comments in response to the FCC’s *Second Order on Reconsideration and Further Notice of Proposed Rulemaking on the Creation of a Low Power Radio Service* (the “*Second LPFM NPRM*”).

The sole purpose of the PRROs comments in this proceeding is to support the status quo on the issue of the relative interference protections afforded to LPFM station and FM translator stations, as well as to reiterate the public interest benefits of public radio FM translator stations. Over nine (9) million persons in the United States receive a public radio signal through a public radio translator station.<sup>1</sup> As shown in the extensive “personal stories” of public radio translator licensees (with an aggregate 220 translator stations) in Appendix A, these stations provide vital local service to citizens across the entire United States. Disruption of this service would harm the public interest.

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<sup>1</sup> Corporation for Public Broadcasting, Network Report, Census of Population and Housing (1990).

In the first LPFM proceeding, the FCC decided to “place LPFM stations and FM translators on essentially equal footing.”<sup>2</sup> Now, LPFM advocates have asked the FCC to “reassess” the interference relationships between LPFM stations and FM translators and give LPFM stations priority over FM translators. The FCC agreed to reevaluate the co-equal status, given the “extraordinary volume” of applications filed in the FCC’s March 2003 (nonreserved band) FM translator filing window.

The PRROs urge the FCC to continue with the current “co-equal” status of the LPFM service and FM translator service. The FCC struck the right balance before with co-equal status, and cannot now change its mind without drastically affecting existing public radio service via FM translators and disserving the public’s interest in its existing and future public radio FM translator service.

## **I. INTRODUCTION**

EPR, CPR, PRIMA, SPR and WSPR are regional membership organizations for public radio stations across the contiguous United States. These organizations represent over 169 noncommercial educational radio station licensees with over 370 combined station transmitters (primary and FM translators).

Together, the PRROs represent public radio stations in virtually every state in the United States. PRRO member stations include stations that serve entire states or regions, major markets, medium markets, smaller markets and isolated rural areas with national and local programming, including substantial news and public affairs programming, classical music programming, jazz, world music, alternative music, minority-oriented programming (including African/American, Hispanic and Native American programming) and other niche music and cultural programming

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<sup>2</sup> *Creation of Low Power Radio Service*, 15 FCC Rcd 2205 (2000)(“*First LPFM Order*”).

genres. PRRO members include FCC licensees that are state and governmental entities, college and universities, school districts and nonprofit educational organizations (also known as “community” licensees whose governing boards are drawn from the community of license);

PRRO members engage in active community outreach. The unifying factor among these diverse licensees and stations is a common mission to provide the highest quality public radio service to their communities of license and the citizens of the United States. PRRO stations do not answer to a corporate bottom line or to corporate shareholders; their very *raison d’être* is public service.<sup>3</sup>

While the PRROs are sympathetic to some of the concerns expressed by the LPFM advocates about the overwhelming number of “speculative” FM translator applications filed in the March 2003 window, the right answer is not to give LPFM stations priority over FM

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<sup>3</sup> The Commission itself has stated:

Public broadcasting is explicitly encouraged by various Commission rules and policies. Perhaps most notable among these is our spectrum reservation policy whereby noncommercial stations are afforded protected frequency allocations for their exclusive use. Other state and federal governmental entities also accord public stations favored status by various means, including preferential tax treatment and considerable direct financial subsidies...[T]he very definition of the service, the status of its operating stations, and its essentially non-profit, noncommercial programming nature make public broadcasting stations very different, in programming terms, from their commercial counterparts. With this in mind, we expect that as a practical matter the programming of these stations will reflect their special status and that they will provide their communities with significant alternative programming designed to satisfy the interests of the public not served by commercial broadcast stations. We would assume, for example, that in the rare case where the commercial media market appeared to ignore a significant issue in a community, the public stations would be among the first to address it, providing an important alternative and competitive spur to the other local media. Such responsive programming would be entirely consistent with the nature and historical performance of these stations.

*See, e.g., Revision of Program Policies and Reporting Requirements Related to Public Broadcasting Licenses*, 98 FCC 2d 746, 751 (1984).

translators. The right answer is for the FCC to place reasonable limitations on aggregate FM translator ownership nationwide, to impose reasonable limitations on the number of FM translator applications that can be filed by an applicant (or a related entity) during any given filing window, and to enforce existing FCC requirements regarding the appropriate licensing and use of non-reserved band FM translator stations.

As membership organizations, the PRROs are vitally interested in ensuring that the radio spectrum used by their public radio member stations is properly regulated, so that PRRO member stations can continue to serve existing listeners and will have opportunities to grow and expand public radio service throughout the United States. The PRROs have concluded that changing the “status quo” with respect to FM translator and LPFM interference protections would unnecessarily de-stabilize existing public radio FM translator service that listeners have relied on (and invested in) over a series of decades, as well as long-held plans for FM translator expansion projects filed in the March 2003 filing window. The public interest would not be served by giving LPFM any sort of priority over FM translators.

Congress has found and declared that:

(1) it is in the public interest to encourage the growth and development of public radio and television broadcasting, including the use of such media for instructional, educational and cultural purposes;

(2) the encouragement and support of public telecommunications, while matters of importance for private and local development, are also of appropriate and important concern to the Federal Government;

(3) it furthers the general welfare to encourage public telecommunications services which will be responsive to the interests of people both in particular localities and throughout the United States, which will constitute an expression of diversity and excellence, and which will constitute a source of alternative telecommunications services for all of the citizens of the Nation;

(4) it is necessary and appropriate for the Federal Government to complement, assist, and support a national policy that will most effectively make public telecommunications services available to all citizens of the United States;



(5) public television and radio stations and public telecommunications services constitute valuable local community resources for utilizing electronic media to address national concerns and solve local problems through community programs and outreach programs;

(6) it is in the public interest for the Federal Government to ensure that all citizens of the United States have access to public telecommunications services through all appropriate available telecommunications distribution technologies;

47 U.S.C. Sec. 396 (a) (2), (4), (5), (7), (8) & (9) (1999).

As the stories set forth in Appendix A demonstrate, these Congressional goals are being fulfilled by public radio FM translator stations.

## **II. UNDERSTANDING THE PUBLIC RADIO TRANSLATOR FRAMEWORK**

In order to reassess the relative interference protections afforded to FM translators and LPFM stations and best serve the public interest, convenience and necessity, the PRROS submit that an understanding of the history and use of public radio's use of FM translators is needed. This section is intended to provide a brief overview of the FCC policies, financing, and other issues that have impacted the public radio industry's deployment of FM translators and, therefore, the public's interest in the continued availability of such service.

### **A. Applicable FCC Rules**

As the FCC staff is well aware, the FM translator rules and policies make a distinction between "reserved band" FM translator stations (on Channels 200-220) and "unreserved band" FM translator stations (on Channel 221-300).

Unreserved Band Translators. Eligibility for unreserved band translators is quite broad. However, commercial stations owning and operating such FM translator stations cannot use the translators to extend service beyond their protected contours – instead, such translators are limited to providing fill-in service within the commercial station's protected contour. FM translators using unreserved channels are not permitted to use alternative signal delivery to feed a

signal to a translator – the translator must be able to pick up an “off-air” feed of the primary station (or of an FM translator that rebroadcasts the primary station). Moreover, the FCC rules strictly limit the ownership structure and financial support for third-party FM translator stations rebroadcasting a commercial station’s signal outside its protected contour. In addition, given the fundraising limitations on translator stations, there is not a compelling financial incentive for third-party entities to own and operate translator stations that rebroadcast commercial stations. For these reasons, the commercial radio industry has not (and cannot) make widespread use of FM translator stations to extend service.

However, public radio stations have successfully used unreserved band FM translator stations to extend service to nearby unserved areas – limited, of course, by the requirement that such translators must receive an off-air feed, and cannot use a satellite feed or alternative signal delivery mechanism.<sup>4</sup> These public radio translators are particularly needed when the reserved band frequencies in the area are unavailable due to frequency congestion, TV Channel 6 protection requirements, or other preclusion issues.

Reserved Band Translators. Eligibility for reserved band translator frequencies is restricted to entities qualifying as “noncommercial educational licensees” under applicable FCC rules. Generally, reserved band translators owned and operated by the licensee of the primary station can be used to expand signal coverage beyond the primary station’s contour. Moreover, such translators are eligible to use alternative signal delivery (microwave, fiber, satellite, etc.) to feed the signal to the translator. For all of these reasons, public radio has long embraced the use

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<sup>4</sup> Thus, Prometheus’s claim that translator applications filed in the March 2003 window (for unreserved band translators) are using satellite delivery must be misplaced. Use of satellite feeds for unreserved band translators (or any other type of feed other than an off-air pick-up) is clearly impermissible under FCC rules. *See Second LPFM* at 16, note 129.

of reserved band translators as a cost-effective way to expand services to the public and provide services to rural and other unserved areas.

Thus, before the massive March 2003 filing window, the vast majority of FM translator stations authorized by the FCC were licensed to noncommercial educational broadcasters – of one sort or another, on reserved band channels and nonreserved band channels -- while only a portion of those translators are licensed to public radio stations.

#### **B. Financing/Funding of Public Radio Translators**

Public radio FM translator projects are financed through a unique blend of federal grants, Corporation for Public Broadcasting (“CPB”) funding, state support, local capital campaigns run by local citizens or citizen groups that desire access to public radio programming, and by charitable contributions to public radio stations. In sum, there has been a vast investment – at all levels – federal, state, local and individual – in the current public radio translator system.

For example, the federal government -- through appropriations to the Corporation for Public Broadcasting (“CPB”) and the Public Telecommunications Facilities Program (“PTFP”) of NTIA, U.S. Department of Commerce -- has invested heavily in FM translator stations to extend service to unserved or underserved areas or provide service to rural areas that are sparsely populated.<sup>5</sup> As shown in Appendix A, more than 110 of the 220 public radio FM translator stations reporting data have relied on PTFP (i.e., federal) funding for translator projects (over 50%).

Many states have also made investments in public radio FM translator stations, either through state-owned public radio stations or through state support of other state-related entities

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<sup>5</sup> This investment is consistent with the Congressional mandate set forth in Section 396(b) of the Communications Act, described above.

that own and operate public radio stations (such as state universities and colleges). For example, Appendix A shows that the West Virginia statewide public radio network, WLRN in Miami, and Minnesota Public Radio all received state appropriations/investments in their FM translator stations (including, for WLRN, State of Florida Department of Education grants.)

Even more importantly, a majority of public radio FM translator projects are funded through some sort of local capital campaign. In those campaigns, active, interested citizens desiring to bring public radio service to their communities have volunteered to seek out contributions from local businesses, local organizations and local individuals, all for the support of the FM translator station. As shown in Appendix A, over 100 of the 220 public radio translator stations reporting data rely on capital campaigns or ongoing community support for their translators (over 45%).

It is important for the FCC to note that local citizens desiring public radio translator service ask for these services in their communities, and pony up their own time, talents and funds to help make public radio FM translator projects happen.<sup>6</sup> Similarly, it would be a mistake for

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<sup>6</sup> See Appendix A. “In Port Orford school children sold soft drinks door-to-door after school to help raise matching funds. Subsequent to the construction of Port Orford’s translator service, the City Government filed its State-mandated Economic Development Plan and identified its public radio translators as among the top-5 factors essential to the City’s financial health and future economic development. In Coos Bay the local community college president took out a personal loan to pay for the construction and then spent another year raising funds in the community to recover the costs. In Crescent City the local hospital administrator spear-headed a local fundraising campaign. In Yreka the city attorney took the matter to the City Council which formally advocated for a fundraising campaign to raise the necessary monies. In Weed the local Chamber of Commerce served as the fundraising agency to secure matching funds. In Burney a local pastor chaired the fundraising campaign and used his pulpit and the local branch of the county library to help spearhead the effort. In Sutherland/Glide the County Commissioners used scarce county funds to match the federal grant monies because they considered providing public radio service so essential to this small community’s welfare.” (Jefferson Public Radio).

“KUNC is a small broadcaster and, as such, can not afford to buy and build translators on its own. The people of Buena Vista and Salida organized and would not be denied. Their grass  
*continued...*

the Commission to think that FM translator stations are not “locally” supported, or that the local community has not already “spoken” about what it thinks will best serve its local interests, when it funds or supports a public radio translator project.<sup>7</sup> Public radio FM translators are just as “local” as LPFMs, in the way that listeners use and rely on those services.

**C. Opportunities for Providing New Public Radio Service Are Limited Right Now**

As the FCC notes in the *Second LPFM Order*, there has been no opportunity for public radio stations to file new reserved band NCE FM applications since before 2000 or reserved band FM translator stations since before 1997. However, despite the freeze on applications, the public’s demand for new public radio stations and new public radio FM translator stations has not abated during this time. In fact, public radio listenership, and demand for public radio services to unserved or underserved areas has mushroomed. There are literally hundreds of expansion and other public radio projects on hold, awaiting resolution of old mutually exclusive FM and FM translator proceedings (to be decided under 307(b) criteria or under the point

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...continued

roots efforts raised enough money to build a translator for their community. It is a similar story for the people in Steamboat Springs. The people in Summit County organized and formed a group called "Summit Public Radio." They own translators that bring in not only KUNC, but also Colorado Public Radio's Classical Music Service (KVOD) and Denver's Jazz Station, KUVO (also a public radio station) into their communities. The Region One Translator Association is set up as a special taxing district to bring rural areas in Colorado's very sparsely populated Eastern Plains television and public radio service. Many of these folks would have no options for public radio without this service.” (KUNC)

<sup>7</sup> See Appendix A. “We received an invitation from a competing Indiana university – Indiana State University – to establish a translator in Terre Haute. ISU President John W. Moore believed that he could improve ISU’s position both as an educational institution and as a magnet for superior faculty, if he could offer an NPR-affiliated public radio station. In addition to the ISU request, WFIU had received hundreds of requests from listeners who missed us. At one point, they were all listening to WFIU on local television cable. When cable removed WFIU, they were left without their public radio fix.” (WFIU)

system), awaiting a filing window for new NCE FM station applications or awaiting a filing window for new reserved band FM translator station application. Simply put, there is a near decade-long backlog on much-needed public radio service expansion.<sup>8</sup>

In the meantime, public radio stations took advantage of the only opportunity in the past eight (8) years to bring much-demanded public radio service to the public. Public radio stations filed applications in the March 2003 FM translator filing window. Because of the limitations noted above regarding off-air delivery for unreserved band translators, these applications were not filed willy-nilly or on a nationwide basis with thousands of filings made for speculative purposes. Instead, public radio stations -- in consultation with experienced engineering and legal advisors -- filed for FM translator stations in nearby areas ("local" to their existing operations) that would best serve the public's needs and fill in the most pressing gaps in coverage.<sup>9</sup> Even so, processing of those applications is now being held up, as the FCC re-evaluates the relative interference protections of FM translators and LPFM stations in this proceeding. Public radio expansion has been stymied -- at every turn.

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<sup>8</sup> In some sense, the backlog is well over a decade -- NCE MX processing was in a state of flux from the initiation of GC Docket 92-52 (in 1992) until the NCE "point system" was upheld by the courts last year.

<sup>9</sup> See Appendix A. "There has been great interest and support (contributions) from people in these communities [to be served by our translators], as was noted in our PTFP grant application. Given the freeze on noncommercial FM applications, translators are the best way to serve this significant and urgent need." (WDUQ); "The largest driving factor to move to build these translators was numerous listener requests for service to their area. The part of Oklahoma to the south/southeast of Oklahoma City is less served by public radio, particularly the news/information program schedule KGOU carries. Oklahomans, coming to Norman or Oklahoma City, discovered our programming and inquired about how KGOU might serve them. Or, they heard about public radio and discovered it here, then tell us they want it in their town. We will be fundraising from these communities to build the various translators because of the public support. When the opportunity was open at the FCC for translator applications in early 2004, we jumped at the chance to expand service to the towns from where we had the most requests and to do it in the most economical way." (KGOU)

#### **D. Public Radio FM Translators Help Put the “Public” in “Public Interest”**

Most compellingly, public radio translators are the epitome of the public interest, at its best. First, public radio translators serve extremely rural communities. According to Appendix D, nearly 70% of public radio translators reporting data serve rural areas (152 of 220 reporting). They go where no one else will go, to provide service to listeners. For example, Station KUNM in Albuquerque operates seven (7) rural translator stations, serving an estimated population of 50,025 persons over an astounding 2,936 square kilometers of combined service areas. Average population density in those areas is only 17.04 persons per square kilometers. But KUNM’s story is not unique, as these excerpts from Appendix A demonstrate:

- \* “The 8 rural translators will be the only local signals in their communities.” (emphasis added) (WRVO);
- \* “There was no reliable public radio service to the [Florida] Keys before these translators were built” (WLRN);
- \* “Listeners in rural areas, such as Union, Clarksburg and Elkins tell us that West Virginia Public Radio (available in these areas only through translators) is their lifeline to news and fine music.” (West Virginia Public Radio);
- \* “New Mexico is a very rural and very poor state. All translators were built at the request of communities.” (KUNM);
- \* “WNCPRI must employ translators to get our signal over and around the mountains of Western North Carolina and onto the ground where the populations reside....While technically these translators are “secondary” services, they provide the only public radio service for many listeners in our rural region - and, in some of our areas the ONLY public radio station that can be received at all.” (WNCPRI)
- \* “We constructed these translators to serve populations in rural areas of Arkansas that were not being served by a public radio service. These communities continue to receive public radio programming through these translators and no full service stations.” (KUAR)
- \* “The Central Coast of California has many areas where steep mountains descend precipitously into the Pacific Ocean, creating pockets of isolated communities

with no access to broadcast media other than KUSP translators.” (emphasis added) (KUSP)

- \* “Rural radio stations are costly to operate and getting the channels is also not easy these days. We have not promoted the Chickasha translator much at all, about 30 miles out of OKC and yet we have enough contributions to keep it on air. It shows a real need in small towns even close to a metro for our service.” (KCCU)
- \* “Listeners in our translator communities often serve KUSP as informal ambassadors to the rest of the community, passing on information, news and weather alerts to those who cannot receive our signal in isolated home or business sites.” (KUSP)
- \* “Placing the translators in operation was a two-fold decision. 1. All the areas were unserved by any public radio service and we believe in our service mission to extend that resource. 2. The topography of Central Pennsylvania made low-power translators the only viable method to reach these population pockets.” (WPSU)

Second, public radio translators help distribute critical emergency information. Without extensive translator networks, many areas would not receive critical emergency news and information.

- \* “The first climber to successfully climb Mt. McKinley in winter, Vern Tejas, was pinned down and had run out of food. Another climber knew of a food cache nearby. Tejas could hear KSKA from our translator and we broadcast the information. He survived and made it down the mountain alive.” (KSKA)
- \* “Our translators carried our station's programming and provided critical emergency information to listeners during the Miller's Reach wildfires. Our news director, while reporting live from the road, was warning of smoke obscuring the road in areas and the need to have car lights on in case a driver suddenly entered a cloud of smoke. He was struck by the power of our broadcasts when cars all around him started turning on their lights.” (KSKA)
- \* “Colorado is a very large state with large areas of sparse population. It also has a great deal of rugged mountainous terrain. Translators serve to relay important messages from the Emergency Alert System. KOA, a 50,000 watt AM station from Denver serves as the state's Primary Entry Point (PEP) for national alerts. It also serves as the originating station for Child Abduction Alerts, as well as other important life-saving messages of concern to Colorado's citizens. KOA's sky wave coverage allows it to reach 38 states at night, but often this sky wave propagation is weak and spotty around the state [of Colorado]. Daytime ground wave coverage is also inadequate to cover the entire state. A lot of stations, both



public and commercial, rely on KUNC's translators (and other stations' translators) to receive these important alerts. It would be very difficult and costly to re-invent this much needed and efficient relay network.” (KUNC)

- \* “The [KUAT and KUAZ] translators are especially important to southern Arizonans for providing information about wildfires (the last several years have seen many large fires in the mountains of southern Arizona), and the severe weather and flooding that usually accompanies southern Arizona’s monsoon season of July and August. (KUAT and KUAZ)
- \* “WRVO delivers frequent weather warnings and other community information [via its translators] (WRVO)
- \* “We regularly receive phone calls from our listeners in Big Sur telling us of road and weather conditions in an area where heavy rains and flash floods are common” (KUSP)

Third, public radio translator provide programming that listeners find compelling.

Simply put, listeners want this translator programming – it serves their local needs:

- \* “My personal anecdote was years ago playing Just Jazz. I got a call from the marine operator who patched through a call from a fishing boat on the ocean. The caller didn't want to request a song, he just wanted to say how much he was enjoying the music I was playing. I think of him regularly and how important our service was to him on that fishing boat.” (KSKA)
- \* “There was no classical music station serving Kokomo. Listeners, particularly those associated with the Indiana University Kokomo Campus, asked WFIU to extend a translator into the area. Since then, we have a strong audience, which we share with WBAA-AM – a public radio talk service from Purdue University. Listeners tell us that they enjoy a full public radio experience between the two stations. The service that most listeners cite as important is the cultural affairs messages that we offer for the Kokomo area.” (WFIU)
- \* “Public service is a cornerstone of KPLU. Our seven translators extend that public service to a quarter-million people in western Washington who otherwise would not be able to hear what we broadcast. No other delivery system can match the flexibility, affordability and convenience provided to the audience by broadcasting. Generally our translator signal provides the only comparable programming available to those people. No LPFM can match the breadth and quality of the programming KPLU provides to these audiences. In a more specific example, no LPFM can match the resources we allocate to northwest news, and the subsequent regional news programming we produce, which is local, relevant and valuable to the audiences tuning to our translators. Listeners to our translators show they value the service we provide by direct financial contributions. In every case the local money contributed from residents surrounding one of our translators covers the cost of providing our public service to that population.” (KPLU)

- \* “Big Sur is home to cultural institutions, such as Esalen Institute, the historic Henry Miller Library and the Nepenthe restaurant, that depend on the KUSP translator to announce calendar listings and PSAs of events in the area.” (KUSP)
- \* “The Coshocton Translator fills in an important gap in our coverage area as it serves the town of Coshocton that our full power transmitter does not reach due to terrain issues. Coshocton is a small, rural town with a loyal arts and cultural community that relies on this service for news and cultural that is provided only through this translator service to the town. We have regularly participated in arts and cultural activities in the community and are seen by citizens in the community as a lifeline to NPR news and classical music.” (WOSU)
- \* “At the moment, KUNR is off the air in Bishop, California and the station has been inundated with emails and phone calls from local residents. They cannot receive NPR news and programs from any other source. The station is also their resource for classical music, jazz, blues and local news and weather updates. Whenever we are off the air, we hear from listeners about how much they miss the broadcast and how important it is for them to receive public radio programming.” (KUNR)
- \* “The comments we have received from listeners --- especially after a new translator had been placed in operation -- have been most appreciative. Many whom had never heard "Morning Edition" or "All Things Considered" were very surprised and thankful that this new service was now available to them. Others, who had relocated into a rural part of our area from out of state, only to find that a public radio signal was not to be found, were even more thankful when "an old friend" was brought back to their dials.” (WPSU)
- \* One Terre Haute, IN, listener reported that “in order to hear his favorite [public radio] programs, he had to get in his car and start a driving trek toward Bloomington” (WFIU).

Fourth, when public radio translators have technical problems or go “off-air,” the public notices and makes its unhappiness about service disruptions known:<sup>10</sup>

- \* “[w]henever one of our translators has a technical problem, the telephones ring off the hook and the emails come pouring in” (KCBX)
- \* “Whenever translator coverage is interrupted, we receive phone calls immediately, expressing concern about loss of KUSP programming.”
- \* “We always hear from residents in Sierra Vista and nearby Huachuca City and Ft. Huachuca if there are technical problems with our translator. Further, we often

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<sup>10</sup> See also Appendix A.

hear from residents of Sierra Vista and its growing environs who request that the translator signal be “increased” so as to better serve the population.” (KUAT)

- \* “We receive many calls when any of KUAT-FM’s translators are experiencing technical difficulties or are off the air. We also know from inquiries via telephone, letter and e-mail, and our membership records that we have many listeners who can pick up KUAT-FM’s signal only from translator broadcasts.” (KUAT)
- \* “We certainly do hear from listeners when the translator is off or when we receive interference.” (KVCR)
- \* “We know people are listening as they report to us when a translator is off the air. We have invested considerable time and money in improving the reliability of W293AF over the past year because of listener response. Listener response has indicated to us that W266AF has indeed provided a clear signal in areas of our city of license where various development and other sources of interference had adversely impacted the ability to receive a strong signal from WILL-FM.” (WILL)
- \* “When our translators are out of service, listeners contact us to let us know how important those translators are to them. For people in these communities, our translators are their only opportunity to listen to public radio. Public radio not only provides them with national news and information, but with important news about state politics and issues of interest especially to Arkansans. Our local news coverage includes stories that concern the residents of our translator communities.” (KUAR)
- \* “At the moment, KUNR’s translator is off the air in Bishop, California and the station has been inundated with emails and phone calls from local residents. They cannot receive NPR news and programs from any other source. The station is also their resource for classical music, jazz, blues and local news and weather updates. Whenever we are off the air, we hear from listeners about how much they miss the broadcast and how important it is for them to receive public radio programming.”

### **III. IMPACT ON EXISTING PUBLIC RADIO LISTENERS AND SIGNALS**

As an initial matter, the PRROs acknowledge and respect that FM translator stations are secondary services to primary FM radio stations. This is something that the public radio industry has long understood and accepted (albeit sometimes painfully when a translator is displaced) – translators must make way for new primary station services. But making FM translator service secondary to the (still relatively new) LPFM service is an entirely different matter. The FCC should not change the “rules of the game” for translators and deprive listeners of current public

radio translator service. Such a change jeopardizes the substantial federal, state, local and individual investment in existing public radio FM stations. While LPFMs offer important local benefits as niche services or for start-up community groups, it is wrong for the FCC to assume that LPFMs are inherently more “local” than public radio FM translators, or that the public would prefer – or benefit more – from LPFM service, than from enjoying long-standing (or new) public radio FM translator service.

First, giving LPFMs any type of priority over FM translators will jeopardize public radio service on FM translator stations throughout the country, particularly those in the most sparsely populated regions. As cited above and based on 1990 Census data, over nine (9) million persons in the United States receive a public radio signal through a public radio translator station.<sup>11</sup>

Second, the PRRO member stations report that public radio FM translator stations are sometimes operated “at the margin” or “at a loss,” in that the costs of operating the public radio translators generally exceed (or just equal) the donations received from listeners served by those translators. The PRRO stations persist in the operation of translators because they provide valuable service to communities -- many times, the only public radio service to listeners in isolated areas.<sup>12</sup> Thus, any action by the FCC that would make translators more difficult or costly to operate, or impair translator reception in any way, will have a corresponding negative impact on public radio translator service across the country.

Third, both the input and output signals of FM translator stations would be subject to interference from LPFM stations, including first, second or third adjacent channel interference.

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<sup>11</sup> Corporation for Public Broadcasting, Network Report, Census of Population and Housing (1990).

In fact, interference to translators is likely because new LPFM stations are likely to be established in areas closest to population centers where frequencies are “available,” such as suburban areas and communities immediately adjacent to metropolitan areas that fall just outside the mileage separations under LPFM rules. These are the very areas where public radio translators – that “extend” the public radio signal from the metro area to surrounding areas -- would require protection from LPFM. In fact, interference with these suburban translators could knock out entire chains of public radio service in states or regions.<sup>13</sup> The “input” signals for FM translators must traverse these areas in order to reach the translators; moreover, these are also the areas where FM translators are likely to be located in order to “extend” public radio service. Even an LP10 LPFM station could disrupt translator service.

In sum, if LPFM is given a higher priority than FM translators, an unknown (and unknowable) amount of the nine (9) million persons receiving “secondary” FM translator services can expect to lose service. The PRROs submit that any loss of existing service to the public from start-up LPFMs is unacceptable.

Fourth, even if the FCC would give existing translators priority over LPFM, but not new FM translators, the expansion of public radio translators to new service areas would be restricted because “later comer” public radio translators would be subject to being forced off-air by subsequent LPFM filers. As marginal operations, already dependent on a quilt work of funding

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*...continued*

<sup>12</sup> “One of the downsides of our translator network is that it is quite geographically large. While this places an extra burden on our engineering staff, we do know that the service is appreciated and valued.” (WPSU)

<sup>13</sup> For example, see the map of KUER-FM’s Utah translator service in Appendix A. Interference that knocked out reception of the input signal to the Delta, Utah translator would knock out seven other translators later in the chain.

for survival, FM translator should be protected, as “co-equals” to LPFM, not relegated to a lower priority status. Moreover, in many cases, public radio listeners have been patiently waiting eight (8) years for new FM translator service in their communities. These new public radio FM translators (from March 2003) will help meet those long-denied needs for listener service. These listeners have waited long enough.

Fifth, as the *Second LPFM Order* acknowledges, there has been a massive onslaught of FM translator applications by national “noncommercial” and other filers who are not affiliated with public radio stations.<sup>14</sup> Thus, public radio stations are already facing increasing difficulties finding available frequencies for the future expansion of FM translator service. Giving LPFM priority over translators would only further complicate and retard the development of public radio station translators, which are an essential ingredient in providing public radio service to all citizens of the United States, as Section 396(a)(7) of the Communications Act mandates.

Sixth, as explained above, giving LPFMs a new priority over FM translators will also jeopardize the substantial federal, state and private investment in public radio stations. See Appendix A for detailed information on translator funding. Existing public radio transmission plants were conceived, engineered and funded based on the FCC’s existing reserved and nonreserved FM band allocation system and in contemplation of the spectrum protection long afforded by the current rules. As described above, the existing public radio infrastructure depends heavily on FM translators to extend service.

Through the auspices of CPB and federal funding from PTFP, the federal government has acted to fulfill the mandate of Section 396(a) of the Communications Act. Over the course of the

past several decades, public radio transmission systems were built with federal and state support, as well as private support from corporations and individual donors. The Commission should not give priority to the LPFM service that would jeopardize these investments (which include significant local investment as shown above in Appendix A) or that would preclude the future expansion and growth of public radio service nationwide.

Even now, public radio struggles with fiscal difficulties that do not plague commercial radio. This is so even with the benefits of CPB-funding, substantial state funding, institutional support from colleges and university licensees, committed listener/donors, established corporate support, and (sometimes) sophisticated fundraising, as well as the highest-quality programming and support provided by NPR, Public Radio International and independent public radio producers. Public radio needs the economical service provided by its public radio translators.

#### **IV. THE FCC ALREADY HAS THE TOOLS TO RESOLVE THE PROBLEM**

In the *Second LPFM NPRM*, the FCC points to the extraordinary volume of FM translator applications filed in the March 2003 filing window (more than 13,000), as the rationale for revisiting the already-decided LPRM and FM translator priorities. With all due respect, the FCC had (and still has) the tools to resolve the LPFM advocates' concerns, as well as FM translator application "flood" problems.

First, the FCC itself controls the timing over application filing windows. It "gave" the LPFM applicants an LP100 filing window that preceded the March 2003 FM Translator Filing Window (and the still as yet unscheduled and unplanned first-ever Reserved Band FM Translator

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*...continued*

<sup>14</sup> See Comments and Reply Comments of Rocky Mountain Public Radio and West Coast Public Radio, as well as the Comments and Reply Comments of the Station Resource Group, in MM Docket No. 95-31.

Filing Window that the public radio industry so fervently needs). Thus, it is fair to say that LP100 applicants had their “fair bite” at the spectrum apple – before any FM translators. The FCC could have (but did not) open an LP10 filing window before choosing to proceed with the March 2003 FM Translator Filing window. Since LPFMs and FM translators are – at the moment -- “co-equal” in priority, the scheduling of filing windows – in and of themselves – gives the FCC some control over which applications have priority over others.

Second, public radio advocated argued – forcefully— in other proceedings, that the FCC should impose an upper limit on the number of applications that could be filed in any NCE FM or FM translator filing window, in order to avoid just such a flood of applications. If the FCC had been concerned about a massive flood of applications, it could have set a limit (even a high one) on the number of applications that could be filed in the March 2003 FM Translator Filing Window. Even now, the FCC could set a limit on the number of translator stations or permits that can be owned by any one entity (or related entities), or could decrease the 8,000 still-pending FM translator applications by requiring applicants to limit the number of pending applications to a reasonable (even a high, reasonable) number – such as 100 per entity. These reasonable steps alone would resolve a great deal of the LPFM “preclusion” problem.

Third, based on the experience of the PRRO member stations, a large number of the March 2003 FM Translator applicants are speculators, who are not interested in building and operating a translator station, but only in selling the translator permits. The FCC could eliminate (or limit) such speculative applicants by not allowing sales of unbuilt permits, or by re-instituting its prior policies on sales of unbuilt permits, such that only the out-of-pocket costs of the application are reimbursable to the applicant. Again, this is a reasonable step that ensures translators are truly wanted and not simply a means to a quick (attempted) profit.



Fourth, the FCC could cut down on the number of meritless FM translator applications by strictly enforcing the licensing and use policies for non-reserved band FM translator stations, by refusing to permit “curative” amendments for certain FM translator application defects, and by setting up certain basic application criteria. Based on information and belief, a large number of non-reserved band FM translator applications in the March 2003 window: (a) specified a “primary” station that had not given its written consent to be rebroadcast by the proposed translator applicant; (b) could not, under any circumstances, receive off-air the signal of the primary station it specified as an input channel; (c) did not have any reasonable assurance of site availability; and/or (d) could not have certified as to financial qualifications or made an adequate showing that the applicant had the necessary resources to build the operate a translator stations for three months without revenue. Any or all of these measures would drastically reduce the number of frivolous FM translator applicants, giving LPFMs many more opportunities.

In sum, the FCC should not throw the baby (public radio FM translators) out with the bathwater (the flood of questionable FM translator applications filed by a small group of non-local applicants). There are better ways to fix the problem than by use of draconian measures. The FCC does not need to change wholesale the priority of FM translator applicants and LPFM to resolve the “flood” problem.

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## **V. CONCLUSION**

For the reasons set forth above, and as demonstrated in the attached Appendix A, the PRROs submit that the FCC should maintain the “status quo” with respect to LPFM and FM translator priority. The services should have “co-equal” status. Both are important, both serve very important “local” needs (albeit in different ways), but public radio FM translators have a long-standing existing audience that should not be disrupted, as well as a need to serve future audiences in a manner that won’t face undue disruption. The FCC can give LPFMs greater opportunities by better management (and limitations) on FM translator windows and application requirements, and can do so right now, to winnow down the March 2003 translator window applications. Keeping both services “co equal” in status is the best solution and best serves the public interest.

Respectfully Submitted,

**EASTERN PUBLIC RADIO**

**CALIFORNIA PUBLIC RADIO**

**PUBLIC RADIO IN MID-AMERICA**

**SOUTHERN PUBLIC RADIO**

**WESTERN STATES PUBLIC RADIO**

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**APPENDIX A**  
**To**  
**PRROs Comments**

## **SUMMARY OF STATISTICS IN APPENDIX A**

Total Number of Public Radio FM Translator Stations in Appendix A	220	100% of those reporting
Total (Combined) Estimated Population Served for Public Radio FM Translators in Appendix A	4,852,610 persons	-
Total Number of Rural Communities Served by Public Radio FM Translator Stations in Appendix A	152	69.09% of those reporting
Total Number of Public Radio FM Translators in Appendix A that used Federal Money for Translator Projects	111	50.45% of those reporting
Total Number of Public Radio FM Translators in Appendix A that used or rely on Local Fundraising for Translator Projects	100	45.45% of those reporting

## **WRVO, OSWEGO, NY**

Station Call Sign: WRVO

Number of Main Stations: 4

Number of Translators: 11 cp's not on air – 1 “frozen application”

Call Signs and City of License of All Translators (attach list):

W260BE Watertown NY

W291BB Boonville NY

W277BK Woodgate NY

W261BB Steuben NY

W237CC Rome NY

W222AT Hamilton NY

W293BE Norwich NY

W241AW Geneva NY

W238AT Cortlandville NY

W237BJ Dryden NY

W272BQ Marathon NY

BNPFT-20030310BBB Ithaca NY (Pending)

Estimated Population Served by All Translators: 65,000

Are any of your translators “daisy chained” (ie, one feeding another): yes

How Many of Your Translators Serve Rural Communities: 9

How Many Translators Were Constructed with Federal Financial Assistance: PTFP Pending

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? All but Watertown were the result of grassroots campaigns. Watertown fills in a shadow in WRVJ's null toward Canada.

What factors prompted your decision to construct these translators?

In each case listeners had been using extraordinary means to receive WRVO or one of its class A relays. Local funds were raised to potentially match PTFP grants. In 8 cases this will be first grade A public radio service to the rural community.

Please provide any stories or anecdotal evidence about your translator listeners that you think would be helpful in showing the public interest benefits of your translator service.

All of these translators are located in counties already partially served by the Full Service signals. WRVO is a key inter-county relay station in the NY EAS plan and delivers frequent weather warnings and other community information.

The 8 rural translators will be the only local signal in their communities.

All of WRVO's signals are included in the region's emergency plans for communications.

## **KCBX, San Luis Obispo, CA**

All of these translators serve areas that have large rural areas, but are not designated in any official ways as rural, since they also have significant metro areas.

K216AG --Cayucos, North Morro Bay, California  
Population included: 10,000

K215AH -- Avila Beach, Shell Beach, Pismo Beach, California  
Population included: 21,297

K215AG -- Solvang, Goleta, California  
Population included: 35,584

K215AF -- Cambria, California  
Population included: 8,000

Total Population for all 4 translators: 74,881

4. We have not received any State funding. The original translators were all paid for with funds from PTFP in 1984.

5. There were not local Capital campaigns for the translators; however, we did urge people in these areas to pay for the costs by donating to KCBX, after the fact.

6. With the exception of K215AG, we decided to make an investment in translators in order to reach those residents in our primary coverage area who were unserved due to extreme terrain conditions. K215AG serves an area north of Santa Barbara. Because of mountainous terrain, this area does not receive most other radio stations. We were the first public radio signal to serve most of this area.

7. It is obvious that our translator signals are important to listeners in those areas. Firstly, KCBX receives significant monetary support from areas primarily served by translators. Secondly, whenever one of our translators has a technical problem, the telephones ring off the hook and emails come pouring in.

## **WFIU, BLOOMINGTON, IN**

Station Call Sign: WFIU

Number of Main Stations: 1

Number of Translators: 3

Call Signs and City of License of All Translators (attach list):

103.7 Bloomington  
100.7 Columbus W264AL  
106.1 Kokomo W291AM  
95.1 Terre Haute W236AE

Estimated Population Served by All Translators:

Bloomington approx. 70,000  
Columbus approx. 39,000  
Kokomo approx: 46,113  
Terre Haute approx: 59,614

Are any of your translators "daisy chained" (ie., one feeding another): no

How Many of Your Translators Serve Rural Communities: none

How Many Translators Were Constructed with Federal Financial Assistance: Kokomo – partial PTFP grant

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? Columbus

What factors prompted your decision to construct these translators? in each case, public comment and requests prompted the building of our translators.

In Columbus: Many listeners told us that they were not able to receive us on the Bloomington 103.7 signal.

In Kokomo: There was no classical music station serving Kokomo. Listeners, particularly those associated with the Indiana University Kokomo Campus, asked WFIU to extend a translator into the area. Since then, we have a strong audience, which we share with WBAA-AM – a public radio talk service from Purdue University. Listeners tell us that they enjoy a full public radio experience between the two stations. The IU/Purdue association on the public radio front is very positive. The service that most listeners cite as important is the cultural affairs messages that we offer for the Kokomo area.



In Terre Haute: We received an invitation from a competing Indiana university – Indiana State University – to establish a translator in Terre Haute. ISU President John W. Moore believed that he could improve ISU's position both as an educational institution and as a magnet for superior faculty, if he could offer an NPR-affiliated public radio station. In addition to the ISU request, WFIU had received hundreds of requests from listeners who missed us. At one point, they were all listening to WFIU on local television cable. When the station removed WFIU, they were left without their public radio fix. One listener told us that in order to hear his favorite programs, he had to get into his car and start a driving trek towards Bloomington. His wife, who had long suspected him of having an affair, thought she had her proof!

### **KOSU-FM, Stillwater, OK**

My two translators are owned by a third-party, but will rebroadcast KOSU-FM. The translators are K297AQ in Bixby, Oklahoma (serves metro area) and K270BK in Okmulgee, Oklahoma (serves rural area). Together the two add an estimated 300,000 listeners. These are construction permits which will be built within the next few months.

We added these translators to improve our service to the state of Oklahoma.

**WLRN, Miami, FL**

Station Call Sign: WLRN 91.3 FM

Number of Main Stations: ONE

Number of Translators: FIVE

Call Signs and City of License of All Translators (attach list):

W228AY - Key Largo, FL  
W221AY - Islamorada, FL  
W227AD - Grassy Key (Marathon), FL  
W206AS - Big Pine Key, FL  
W210AS - Key West, FL

Estimated Population Served by All Translators:

Permanent population area for all five translators is about 85,000. Seasonal visitors average over two million for the entire group.

Are any of your translators "daisy chained" (ie., one feeding another):

Key Largo picks up WLRN's main signal off air

Islamorada picks up WLRN's main signal off air

Big Pine Key picks up the signal from Grassy Key (daisy chain)

Key West is fed by telephone line

How Many of Your Translators Serve Rural Communities:

None of the translators served measured markets, although all are in the TSA of WLRN, Miami,

How Many Translators Were Constructed with Federal Financial Assistance: All five were built with PTFP funds (50%) and State of FL DOE grants (50%) in 1992.

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? None to the best of my knowledge

What factors prompted your decision to construct these translators?

There was no reliable public radio service to the Keys before these translators were built. However, the system was ill conceived from the beginning as there is much interference from ducting, etc. because of the fact that all are located on an island chain, surrounded by water. FM reception thus is lousy to put it mildly. Since they were built, over fifteen new stations have come on the air in the Keys making the FM dial even more congested than it was previously.

## Jefferson Public Radio

Station Call Sign: *Jefferson Public Radio (KSOR, et. al.)*

Number of Main Stations: *21*

Number of Translators: *36*

Call Signs and City of License of All Translators (attach list): *LIST ATTACHED*

Estimated Population (Best Guess OK) Served by All Translators: *500,000*

Are any of your translators "daisy chained" (ie., one feeding another): *YES*

How Many of Your Translators Serve Rural Communities: *27*

How Many Translators Were Constructed with Federal Financial Assistance: *34*

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? *All*

What factors prompted your decision to construct these translators?

Individuals, local government representatives or local organization representatives had heard our stations while traveling and then asked what it would take to extend our signal to their community. *In most instances the construction costs would have been well beyond the financial capability of communities of the sizes involved and we therefore relied upon Federal grant assistance, joined with local community commitments to raise the matching funds, to construct the requested translators. Since JPR was the sole public radio service available in all of these communities at the time (and even now only four of these communities have service from another public radio station), we believed it was important to try provide these communities with public radio service - and also believed we were helping to fulfill the federal mandate that a public radio signal should be made available to all Americans.*

*The communities to which our service was extended by translator clearly expressed the importance of the service to them and took significant steps to assure they would secure translator service. These communities are too small to support full-service public radio stations.*

*In Port Orford school children sold soft drinks door-to-door after school to help raise matching funds. Subsequent to the construction of Port Orford's translator service, the City Government filed its State-mandated Economic Development Plan and identified its public radio translators as among the top-5 factors essential to the City's financial health and future economic development. In Coos Bay the local community college president took out a personal loan to pay for the construction and then spent another year raising funds in the community to recover the costs. In Crescent City the local hospital administrator spear-headed a local fundraising campaign. In Yreka the city attorney took the matter to the*

*City Council which formally advocated for a fundraising campaign to raise the necessary monies. In Weed the local Chamber of Commerce served as the fundraising agency to secure matching funds. In Burney a local pastor chaired the fundraising campaign and used his pulpit and the local branch of the county library to help spearhead the effort. In Sutherland/Glide the County Commissioners used scarce county funds to match the federal grant monies because they considered providing public radio service so essential to this small community's welfare.*

Jefferson Public Radio  
Page 2

<b>Call</b>	<b>Freq.</b>	<b>Community of License</b>
K206AN	89.1	CALLAHAN/FT. JONES
K215AR	90.9	CAVE JUNCTION
K249BS	97.7	GRANTS PASS
K207BQ	89.3	PORT ORFORD
K220DQ	91.9	ROSEBURG
K207BU	89.3	YREKA
K201BG	88.1	DEAD INDIAN
K204AV	88.7	LINCOLN/PINE
K205BD	88.9	GRANTS PASS
K208CC	89.5	CAVE JUNCTION
K220AC	91.9	CANYONVILLE
K207AB	89.3	SUTHERLIN/GLIDE
K204AG	88.7	CAMAS VALLEY
K206AI	89.1	COOS BAY
K219AM	91.7	BANDON
K201BK	88.1	COQUILLE
K220AJ	91.9	GOLD BEACH
K213BU	90.5	PORT ORFORD
K217AF	91.3	LANGLOIS
K218AH	91.5	GOLD BEACH
K216AK	91.1	BROOKINGS
K206AE	89.1	CRESCENT CITY
K213AI	90.5	KLAMATH FALLS
K219AP	91.7	CHILOQUIN
K206AF	89.1	BEAVER MARSH
K220BZ	91.9	HAPPY CAMP
K220BJ	91.9	KLAMATH FALLS
K216BD	91.1	FT.JONES
K215BI	90.9	BURNEY
K215BP	90.9	REDDING
K217AS	91.3	BIG BEND/BUSH BAR
K208AH	89.5	WEED
K208AX	89.5	LAKEVIEW
K202AP	91.3	McCLOUD/DUNSMUIR
K217BZ	91.3	GRANTS PASS
K216FE	91.1	CRESCENT CITY

**KPLU, Tacoma, WA  
KVIX, Port Angeles, WA**

Station Call Sign: **KPLU-FM, KVIX-FM**

Number of Main Stations: **2**

Number of Translators: **7**

Call Signs and City of License of All Translators (attach list):

<b>K265DP - Aberdeen, WA</b>	<b>K204BI - Bellingham, WA</b>	<b>K211AP - Centralia, WA</b>
<b>K283AI - Longview, WA</b>	<b>K216EN - Mt Vernon, WA</b>	<b>K212AG - Raymond, WA</b>
<b>K201AB - W Seattle, WA</b>		

Estimated Population Served by All Translators: **250,000**

Are any of your translators "daisy chained" (ie., one feeding another): **NO**

How Many of Your Translators Serve Rural Communities: **5**

How Many Translators Were Constructed with Federal Financial Assistance: **6**

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? **0 <none**

What factors prompted your decision to construct these translators?

**The desire to extend KPLU's public service and public radio to more of the western Washington state population.**

**Public service is a cornerstone of KPLU. Our seven translators extend that public service to a quarter-million people in western Washington who otherwise would not be able to hear what we broadcast. No other delivery system can match the flexibility, affordability and convenience provided to the audience by broadcasting. Generally our translator signal provides the only comparable programming available to those people. No LPFM can match the breadth and quality of the programming KPLU provides to these audiences. In a more specific example, no LPFM can match the resources we allocate to northwest news, and the subsequent regional news programming we produce, which is local, relevant and valuable to the audiences tuning to our translators. Listeners to our translators show they value the service we provide by direct financial contributions. In every case the local money contributed from residents surrounding one of our translators covers the cost of providing our public service to that population.**

## **West Virginia Public Radio**

1. Calls Signs and Locations of your Translator Stations AND whether they serve RURAL or METRO areas:

W-203-AE 88.5, Elkins, WV  
W-220-BK 91.9, Logan  
W-218-AT 91.5 Union, WV  
W-219-BM 91.7 Matewan, WV  
W-297-AA 107.3 Clarksburg, WV

All serve rural areas.

2. Estimated population served by your Translators  
15,000 is "best guess"
3. Any maps showing your translator coverage (some of you have these on your websites)  
Yes but it's not on our website. I'll try to send it electronically.
4. Whether or not you received federal or state funding for your translators  
Yes, both state and federal funding.
5. Whether or not there was a "local" capital campaign for your translator.  
No.
6. Why your organization decided to make the investment in translator stations (i.e., what prompted your decision)

We are a statewide radio network licensed to the state of WV and therefore had a responsibility to extend the signal to as many West Virginians as possible. The state provides about 50% of the funding to WV Public Broadcasting, a joint licensee.

And it is a fact that "Listeners in rural areas such as Union, Clarksburg and Elkins tell us that West Virginia Public Radio (available in these areas only through our translators) is their lifeline to news and fine music."





See Map – West Virginia FM Coverage



## KUSP, Santa Cruz, CA

Call Sign	Community of License	Kind of Area Served	Population (60dbu)	Population (54dbu)	Federal Funds Used?	Local Capital Campaign?
K206BQ	Hollister CA	rural *	55786	210355	yes	no
K207CN	Santa Cruz CA	urban #	77746	95387	no	no
K212AA	Los Gatos CA Palo Colorado Cyn	suburban	79185	205773	no	no
K217EK	CA	rural	204	204	yes	yes
K290AE	Big Sur Valley CA	rural	362	636	yes	yes

\* this translator serves an area undergoing rapid urbanization. Between 1990 and 2000 San Benito County was, in percentage terms, the fastest growing county in California; it adjoins Santa Clara County (Silicon Valley) on the south

# this translator serves portions of KUSP's city of license that receive unsatisfactory reception from the main transmitter due to terrain

The Central Coast of California has many areas where steep mountains descend precipitously into the Pacific Ocean, creating pockets of isolated communities with no access to broadcast media other than KUSP translators.

Big Sur is home to cultural institutions, such as Esalen Institute, the historic Henry Miller Library and the Nepenthe restaurant, that depend on the KUSP translator to announce calendar listings and PSAs of events in the area. We regularly receive phone calls from our listeners in Big Sur telling us of road and weather conditions in an area where heavy rains and flash floods are common, asking about community events and informing us of their received signal quality. The KUSP Big Sur translator is the only access to regional, national and international media for many residents.

Listeners in our translator communities often serve KUSP as informal ambassadors to the rest of the community, passing on information, news and weather alerts to those who cannot receive our signal in isolated home or business sites.

Whenever translator coverage is interrupted, we receive phone calls immediately, expressing concern about loss of KUSP programming. Much of our coverage area is isolated from larger broadcast media sources in the Bay Area. Our translator communities look to KUSP to provide access to alternative and progressive sources of news and information.

Our Santa Cruz translator provides extended coverage to listeners in the city of Santa Cruz, which sits among hills facing out to the ocean. When listeners call with reception problems, directing them to tune in to the translator on the city wharf and oriented back into the city often provides them with better reception.

## **WDUQ, Pittsburgh, PA**

Number of Main Stations: ONE

Number of Translators: Four

Call Signs and City of License of All Translators (attach list): see below

Estimated Population Served by All Translators: 66,000

Are any of your translators "daisy chained" (ie., one feeding another): No - All are off-air reception

How Many of Your Translators Serve Rural Communities: 3

How Many Translators Were Constructed with Federal Financial Assistance: All (4)

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? Local donations and encouragement, but not a specific campaign, as the window to apply was very tight and the chance for success in receiving the CPs was speculative.

### **Narrative:**

WDUQ is just starting its translator system - reaching 66,000 people in communities that have been deprived of NPR news programs, Regional News, Jazz Programming and our reading service to the blind due to the rugged terrain of Pennsylvania. We have received funding for half of the project from the PTFP from the US Department of Commerce.

Our new signals cover areas that are in the fringe signal of WDUQ, but the communities are severely affected by terrain and other FM station interference. They will take to the air in August 2005 will serve the following communities:

Johnstown, PA, 100.5 FM	Call Sign - W263AW
Somerset, PA 104.1 FM	Call Sign - W222AP
New Baltimore, PA 92.3 FM	Call Sign - W281AH
Ligonier, PA 104.1 FM	Call Sign - W281AI

Johnstown, market 189, is the largest of these communities. The others are smaller, rural areas. It should be noted that an LPFM station has been awarded to the Greater Johnstown High School at 103.5 FM.

There has been great interest and support (contributions) from people in these communities, as was noted in our PTFP application. Given the freeze on noncommercial FM applications, translators are the best way to serve this significant and urgent need.

**KPBS, San Diego, CA**

1. Calls Signs and Locations of your Translator Stations AND whether they serve RURAL or METRO areas

K206AC, 89.1 La Jolla; Metro.

2. Estimated population served by your Translators (if available -- a "best guess" will do, if need be)

28,8000

3. Any maps showing your translator coverage (some of you have these on your websites) attached.

4. Whether or not you received federal or state funding for your translators  
no.

5. Whether or not there was a "local" capital campaign for your translator.  
no.

6. Why your organization decided to make the investment in translator stations (i.e., what prompted your decision)

zero coverage on our main signal in that area; significant portion of the city's population.



SEE MAP K206AC





### **KCCU, Lawton, OK**

KCCU has two translators, one in Chickasha, Oklahoma. We put the station on air about six months ago because no public radio signal reached the town. Low power FM would not be able to bring the same quality programming to a community. One broadcaster I know in Texas has built out 6 non-commercial stations and has applied for several translators to bring more signals to town he serves. His efforts have repeated commercial signals and still no public radio in an area that reaching 300,000 people. My point is LPFM that would misplace translators would rob the few rural areas that need public radio service of ever getting such service. Rural radio stations are costly to operate and getting the channels is also not easy these days. We have not promoted the Chickasha translator much at all, about 30 miles out of OKC and yet we have enough contributions to keep it on air. It shows a real need in small towns even close to a metro for our service. Not all metro's have good public radio signals.

## **WOSU, Columbus, OH**

Calls Signs and Locations of your Translator Stations AND whether they serve RURAL or METRO areas

W208AT, Coshocton, OH, Metro

2. Estimated population served by your Translators (if available -- a "best guess" will do, if need be)

Approximately 12,000

3. Any maps showing your translator coverage (some of you have these on your websites)  
See attached pdf

4. Whether or not you received federal or state funding for your translators

The W208AT translator was funded by in-kind contributions and financial gifts from local residents and foundations.

5. Whether or not there was a "local" capital campaign for your translator.

The funding was generated through conversations among local residents who engaged the community for this purpose.

6. Why your organization decided to make the investment in translator stations (i.e., what prompted your decision)

WOSU's investment in a translator in "downtown" Coshocton was at the direct request of local residents who had provided financial support for the creation of WOSE, but were not receiving the quality of signal they anticipated due to the location of the main transmitter related to nearby hills.

7. Any stories or anecdotal evidence about your translator listeners that you think would be helpful in showing the public interest benefits of your translator service.

The Coshocton Translator fills in an important gap in our coverage area as it serving the town of Coshocton that our full power transmitter does not reach due to terrain issues. Coshocton is a small, rural town with a loyal arts and cultural community that relies on this service for news and cultural that is provided only through this translator service to the town. We have regularly participated in arts and cultural activities in the community and are seen by citizens in the community as a lifeline to NPR news and classical music.



SEE MAP W208AT

## KUAZ, TUCSON, ARIZONA

Station Call Sign: KUAZ

Number of Main Stations: Two (2): KUAZ (1550 AM) & KUAZ-FM (89.1), Tucson, AZ

Number of Translators: One (1)

Call Signs and City of License of All Translators (attach list): K219CR, Sierra Vista, AZ

Estimated Population Served by All Translators: 40,500

Are any of your translators "daisy chained" (i.e., one feeding another): No (single translator)

How Many of Your Translators Serve Rural Communities: One (1)

How Many Translators Were Constructed with Federal Financial Assistance: None (0)

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? None (0)

What factors prompted your decision to construct these translators?

Neither KUAZ nor KUAZ-FM's primary signal reaches Sierra Vista, a rural town located close to the Mexican border in southern Arizona. The translator was constructed to provide KUAZ's NPR news and information, and jazz programming to a rural area where such programming was previously unavailable.

We always hear from residents in Sierra Vista and nearby Huachuca City and Ft. Huachuca if there are technical problems with our translator. Further, we often hear from residents of Sierra Vista and its growing environs who request that the translator signal be "increased" so as to better serve the population. Our listeners in southern Arizona tell us that they are grateful to receive NPR programming and that they would like to hear it as they travel to the nearby towns of Bisbee, Douglas and Nogales. The translator is especially important to southern Arizonans for providing information about wildfires (the last several years have seen many large fires in the mountains of southern Arizona), and the severe weather and flooding that usually accompanies southern Arizona's monsoon season of July and August.

## **KUAT, Tucson, AZ**

Station Call Sign: KUAT-FM

Number of Main Stations: One (1), Tucson, AZ

Number of Translators: Five (5)

Call Signs and City of License of All Translators (attach list):

K209AF Northwest Tucson

K209AG Sierra Vista

K205CG Bisbee/Douglas

K219BU Nogales

K208BT Safford

Estimated Population Served by All Translators:

88,000

Are any of your translators "daisy chained" (i.e., one feeding another):

One (1): K209AG Sierra Vista feeds K205CG Bisbee/Douglas

How Many of Your Translators Serve Rural Communities:

Four (4): All except K209AF, which serves the communities of northwest Tucson and the Santa Catalina Mountain foothills.

How Many Translators Were Constructed with Federal Financial Assistance:

One (1): K208BT Safford

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns?

None (0)

What factors prompted your decision to construct these translators?

KUAT-FM, which went on-air in 1975, is the only radio station broadcasting classical music to Tucson and the rural communities of southern Arizona. The impetus for the creation of all but translator K209AF was to provide KUAT-FM's unique classical music and arts format for additional areas of southern Arizona that had no source for such programming. K209AF was commissioned to provide KUAT-FM's signal to areas of northwest Tucson and the Catalina Mountain foothills in north Tucson that are shadowed by topography or overshoot by KUAT-FM's

main transmitter signal emanating from Mt. Bigelow in the Catalina range, which is the second highest peak in the vicinity of Tucson. One of KUAT-FM's subcarrier frequencies is dedicated to broadcasts of SunSounds, a radio reading service for the blind. KUAT-FM is the only source for that service in southern Arizona.

We receive many calls when any of KUAT-FM's translators are experiencing technical difficulties or are off the air. We also know from inquiries via telephone, letter and e-mail, and our membership records that we have many listeners who can pick up KUAT-FM's signal only from translator broadcasts. The translators are especially important to southern Arizonans for providing information about wildfires (the last several years have seen many large fires in the mountains of southern Arizona), and the severe weather and flooding that usually accompanies southern Arizona's monsoon season of July and August.



## **KSKA, Anchorage, AK**

### **1. Calls Signs and Locations of your Translator Stations**

All of our translators qualify as rural.

KSKA, also translates as K 220 AL-Girdwood, K 208 BC-Palmer, K 201 AO-Seward; K 216 BN Prudhoe Bay; and K 216 BG Unalaska.

### **2. Estimated population served by your Translators (if available -- a "best guess" will do, if need be)**

Girdwood 2,000, Palmer 4,500, Seward 3,000; Prudhoe Bay 900; and Unalaska 4,300.

Our translators carried our station's programming and provided critical emergency information to listeners during the Miller's Reach wildfires. Our news director, while reporting live from the road was providing a verbal warning of smoke obscuring the road in areas and the need for cars to have car lights on in case a driver suddenly entered a cloud of smoke. He was struck by the power of our broadcasts when cars all around him started turning on their lights.

The first climber to successfully climb Mt. McKinley in winter, Vern Tejas, was pinned down and had run out of food. Another climber knew of a food cache nearby. Tejas could hear KSKA from our translator and we broadcast the information. He survived and made it down the mountain alive.

My personal anecdote was years ago playing Just Jazz. I got a call from the marine operator who patched through a call from a fishing boat on the ocean. The caller didn't want to request a song, he just wanted to say how much he was enjoying the music I was playing. I think of him regularly and how important our service was to him on that fishing boat.

**KVCR-FM, San Bernardino, CA**

Calls Signs and Locations of your Translator Stations? AND whether they serve RURAL or METRO areas:

K201 CD 88.1FM Victorville, CA, serving a Metro area.

Estimated population served by your Translators

1,000,000 population

Whether or not you received federal or state funding for your translators

No federal or state funding. We paid for this ourselves.

Whether or not there was a "local" capital campaign for your translator.

No local capital campaign.

Why your organization decided to make the investment in translator stations (i.e., what prompted your decision)

The High Desert areas of Victorville / Hesperia / Apple Valley were unserved by any public radio signal. We needed a presence before another public station claimed the territory as theirs.

Any stories or anecdotal evidence about your translator listeners that you think would be helpful in showing the public interest benefits of your translator service.

We receive pledges from that area. Our main signal is spotty. We certainly do hear from listeners when the translator is off or when we receive interference. The listeners do express a desire for a full-power station to saturate the region.

KVCR was on a translator serving the city of Ridgecrest/China Lake an area with a population in excess of 40,000. It went on-air in 1981. The Ridgecrest translator, is not ours. A Christian station went on the air a few months ago on 91.9 (our frequency) and wiped out our station so the Ridgecrest translator could no longer receive us.

## **KUNC, Greeley, CO**

Station Call Sign: KUNC 91.5

Number of Main Stations: 1

Number of Translators: 12

Call Signs and City of License of All Translators:

Owned by KUNC:

K202CV Breckenridge, CO

K201AY Buena Vista, CO

K215BE Estes Park, CO

K215AN Lone Star, CO

K259AC Gypsum, CO

K204BH Yuma, CO

K214AW Walden, CO

K203BQ Steamboat Springs, CO

Owned by Region One Translator Assoc:

K210BJ Holyoke, CO

K206BD Julesburg, CO

K228DL Wray, CO

Owned by Summit Public Radio:

K296CL Dillon, CO

Estimated Population Served by All Translators: 143,000

Are any of your translators "daisy chained" (ie., one feeding another): Yes

How Many of Your Translators Serve Rural Communities: All of them

How Many Translators Were Constructed with Federal Financial Assistance: 7

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? 5

KUNC started building its translator network in the early 80's, initially with Federal funds from PTFP. The first few translators that went on the air were well received by the local communities and surrounding areas. Some time later, other groups from towns not served by public radio service approached KUNC about getting translator service for their communities. KUNC is a small broadcaster and, as such, can not afford to buy and build translators on its own. The people of Buena Vista and Salida organized and would not be denied. Their grass roots efforts raised enough money to build a translator for their community. It is a similar story for the people in Steamboat Springs. The people in Summit County organized and formed a group called "Summit Public Radio." They own translators that bring in not only KUNC, but also Colorado Public Radio's Classical Music Service (KVOD) and Denver's Jazz Station, KUVO (also a public radio station) into their communities. The Region One Translator Association is set up as a special taxing district to bring rural areas in Colorado's very sparsely populated Eastern Plains television and public radio service. Many of these folks would have no options for public radio without this service. Translator stations also provide another valued service.

Colorado is a very large state with large areas of sparse population. It also has a great deal of rugged mountainous terrain. Translators serve to relay important messages from the Emergency Alert System. KOA, a 50,000 watt AM station from Denver serves as the state's Primary Entry Point (PEP) for national alerts. It also serves as the originating station for Child Abduction Alerts, as well as other important life-saving messages of concern to Colorado's citizens. KOA's sky wave coverage allows it to reach 38 states at night, but often this sky wave propagation is weak and spotty around the state. Daytime ground wave coverage is also inadequate to cover the entire state. A lot of stations, both public and commercial, rely on KUNC's translators (and other

stations' translators) to receive these important alerts. It would be very difficult and costly to re-invent this much needed and efficient relay network.

With the consolidation that is going on in today's media, especially radio, the new Low Power FM stations are and will be an important and valued community resource. However, these new LPFM stations should not have higher priority over existing and future translator stations. A lot of people have worked very hard to establish translators for their communities and have grown to depend on them. A lot of public radio stations have expended time and resources to do the same. It would be wrong to place these efforts in jeopardy.

## **WILL-FM, Urbana, IL**

Station Call Sign: WILL-FM

Number of Main Stations: 1

Number of Translators: 2

Call Signs and City of License of All Translators (attach list):

W266AF Urbana, IL  
W293AF Danville, IL

Estimated Population Served by All Translators: 138,000

Are any of your translators "daisy chained" (ie., one feeding another): No

How Many of Your Translators Serve Rural Communities: 0

How Many Translators Were Constructed with Federal Financial Assistance: 2

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? 0

What factors prompted your decision to construct these translators? W266AF was established to fill in gaps in coverage in our metro area (city of license). W293AF carries WILL-FM's signal to a metro area that would not otherwise be able to receive a clear signal delivering public radio fine arts and news programming as well as WILL-FM's locally-produced weather information including comprehensive severe weather coverage.

We know people are listening as they report to us when a translator is off the air. We have invested considerable time and money in improving the reliability of W293AF over the past year because of listener response. Listener response has indicated to us that W266AF has indeed provided a clear signal in areas of our city of license where various development and other sources of interference had adversely impacted the ability to receive a strong signal from WILL-FM.

## **KUAR, Little Rock, AR**

Station Call Sign: KUAR, Little Rock AR

Number of Main Stations: 2

Number of Translators: 3

Call Signs and City of License of All Translators (attach list): K233AD, Monticello, AR; K234AB, Forrest City, AR; K234AC, Batesville, AR

Estimated Population Served by All Translators: 32,500

Are any of your translators "daisy chained" (ie., one feeding another): No

How Many of Your Translators Serve Rural Communities: All

How Many Translators Were Constructed with Federal Financial Assistance: All

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? All

What factors prompted your decision to construct these translators?

We constructed these translators to serve populations in rural areas of Arkansas that were not being served by a public radio service. These communities continue to receive public radio programming through these translators and no full service stations.

Please provide any stories or anecdotal evidence about your translator listeners that you think would be helpful in showing the public interest benefits of your translator service.

When our translators are out of service, listeners contact us to let us know how important those translators are to them. For people in these communities, our translators are their only opportunity to listen to public radio. Public radio not only provides them with national news and information, but with important news about state politics and issues of interest especially to Arkansans. Our local news coverage includes stories that concern the residents of our translator communities.

**KGOU, Norman, OK**

Station Call Sign: KGOU Radio, Norman Oklahoma

Number of Main Stations: 2

Number of Translators: 3 CP's, not yet built

Call Signs and City of License of All Translators (attach list):

K251AR, Shawnee, OK

K276ET, Seminole, OK

K251AS, Ada

Estimated Population Served by All Translators:

K251AR, Shawnee, OK: 28,700

K276ET, Seminole, OK: 7,000

K251AS, Ada: 15,700

Total: 51,400

Are any of your translators "daisy chained" (ie., one feeding another): NO

How Many of Your Translators Serve Rural Communities: all of these are rural communities, miles and miles from the next town.

How Many Translators Were Constructed with Federal Financial Assistance: NONE

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns?: ALL

What factors prompted your decision to construct these translators?

The largest driving factor to move to build these translators was numerous listener requests for service to their area. The part of Oklahoma to the south/southeast of Oklahoma City is less served by public radio, particularly the news/information program schedule KGOU carries. Oklahomans, coming Norman or Oklahoma City, discovered our programming and inquired about how KGOU might serve them. Or, they heard about public radio and discovered it here, then tell us they want it in their town. We will be fundraising from these communities to build the various translators because of the public support. When the opportunity was open at the FCC for translator applications in early 2004, we jumped at the chance to expand service to the towns from where we had the most requests and to do it in the most economical way.

**PUBLIC BROADCASTING OF COLORADO, INC., Denver, CO**

**Central offices/distribution point**

Colorado Public Radio  
Bridges Broadcast Center  
7409 S. Alton Court  
Centennial, CO 80112

**STATIONS: KVID 90.1FM**

Studios 7409 S. Alton Court  
Centennial, CO 80112

Transmitter Lookout Mountain  
855 Colorow Road  
Golden, CO 80401

**KCFP 91.9FM**

Transmitter 5000 Baculite Mesa Rd  
Pueblo, CO 81001

**KKPC 1230AM**

Transmitter 3001 W. 11<sup>th</sup> St.  
Pueblo, CO

**KCFR 1340AM**

Studios 7409 S. Alton Court  
Centennial, CO 80112

Transmitter 1601 W. Jewell Ave.  
Denver, CO 80223

**KVOV 90.5FM**

Transmitter NFSR #318  
Sunlight Peak, CO

**KCFC 1490AM**

Transmitter 3085 Bluff St.  
Boulder, CO 80301

**KPRN 89.5FM**

Studios 414 Main St.  
Grand Junction, CO 81501

Transmitter Black Ridge Communications Site  
261 16 1/2 Road  
Colorado National Monument  
Grand Junction, CO 81503

**KPRH 88.3FM**

Transmitter Waterdog Mountain  
Montrose, CO 81401



**KPRU 103.3FM**

Transmitter Mesa Point  
Delta, CO 81416

**KPRE 89.9FM**

Transmitter Upper Dowd Communications Site  
Vail, CO 81620

**TRANSLATORS:**

<u>Frequency</u>	<u>ID</u>	<u>Location</u>	<u>Signal from?</u>
88.3	K202BI	Doghead Radio Site Parachute, CO 81635	KPRN
88.3	K202BJ	City Water Storage Facility Rifle, CO 81650	KPRN
88.5	K203BB	Nine Mile Hill Radio Site Gunnison, CO 81230	KPRN
88.7	K204BK	Wilson Creek Radio Site Rural Rio Blanco County, CO	KPRN
89.1	K206BE	W Mountain Gunnison, CO 81230	KVOD
90.1	K211BS	Cedar Mountain Radio Site Craig, CO 81625	KPRN
91.1	K216BO	Mellen Hill Radio Site Rangely, CO 81648	KPRN
91.1	K216BP	Lobo Mountain Radio Site Meeker, CO 81641	KPRN
91.5	K218BE	The Blow Out Ouray, CO 81427	KPRN
91.5	K218BG	Flat Top Mountain Radio Site Montrose, CO 81401	KPRN
91.5	K218BF	Kendall Mountain Radio Site Silverton, CO 81433	KVOD

Not owned by CPR:

89.3	K207CK	Breckenridge, CO	KVOD
103.9	K280DZ	Leadville, CO	KVOD
88.7	K204DZ	Dove Creek, CO	KVOD
107.1	K296BO	Laramie, WY	KVOD
102.5	K273AE	Cortez, CO	KVOD
94.9	K230AG	Crystal River Valley	KVOD

Public Broadcasting of Colorado  
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102.3	K222AN	Basalt area	KVOD
93.7	K229AI	Thomasville	KVOD
93.9	K230AN	Old Snowmass	KVOD
102.7	K274AT	Aspen	KVOD

## KUNR, Reno, NV

Station Call Sign: KUNR

Number of Main Stations: 1 (Affiliate station KNCC in Elko)

Number of Translators: 13

Call Signs and City of License of All Translators (See list below):

Estimated Population Served by All Translators: 100,000

Are any of your translators "daisy chained" (ie., one feeding another): 1 (Hawthorne feeds Bishop)

How Many of Your Translators Serve Rural Communities: 9

How Many Translators Were Constructed with Federal Financial Assistance: 4

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? 3

What factors prompted your decision to construct these translators?

The former manager received numerous requests from residents requesting public radio service to their areas. Many rural communities have little access to radio programs, often only be able to receive Christian or western music broadcasts.

At the moment, KUNR's translator is off the air in Bishop, California and the station has been inundated with emails and phone calls from local residents. They cannot receive NPR news and programs from any other source. The station is also their resource for classical music, jazz, blues and local news and weather updates. Whenever we are off the air, we hear from listeners about how much they miss the broadcast and how important it is for them to receive public radio programming.

### TRANSLATORS:

Battle Mountain, NV	K263AB at 100.5
Bishop, CA	K215BQ at 90.9
Crestview, CA	K248AT at 97.5
Denio, NV	K236AU at 91.5
Eureka, NV	K215CM at 90.9
Hawthorne, NV	K218AO at 91.5
Incline Village, NV	K205DG at 89.9
Lovelock, NV	K210AZ at 89.9
Susanville, CA	K220DB at 91.9
Truckee, CA	K201FV at 88.1
Verdi, NV	K219AR at 91.7
Winnemucca, NV	K217AX at 91.3
Yerington, NV	K220BC at 91.9

## **WVTF, Roanoke, VA**

Rural translators (located in the Coal Mining territory of the Appalachian Mountains of far southwest Virginia):

- \* W219CJ Norton, VA
- \* W211BF Big Stone Gap, VA
- \* W212BP Clintwood, VA
- \* W215BJ St. Paul, VA
- \* W217BF Pound, VA
- \* W211BE Lebanon, VA

Each of these translators serves a few thousand folks, but the mountainous terrain makes it difficult to know for sure. We are the only public radio service for many of these citizens, but some areas do receive a Bristol, TN public radio signal as well.

Metro translators:

1. W209AG Roanoke, VA
2. W209AA Charlottesville, VA
3. W208AP Lynchburg, VA

We estimate these translators cover 250,000-400,000 residents total in all three cities.

Maps are attached and can be opened using MS Word.

There was Federal funding of the 6 far southwest rural transmitters thru PTFP under the previous licensee (University of VA at Wise, VA).

No local capital campaign for translators.

Translators were constructed to "fill" WVTF and "extend" WFFC coverage. Listener response to all of the translators is overwhelmingly positive and indicated high usage due to much multipath distortion of FM signals in our mountainous terrain.

We often get calls and letters from listeners asking us to increase the power and coverage area of our translators. They state they want to hear the signal better and in more areas. (Many residents don't understand FC technical constraints.)



SEE RADIO -LOCATOR MAPS ATTACHED

## KUNM, Albuquerque, NM

Station Call Sign: KUNM Albuquerque

Number of Main Stations: One

Number of Translators: Seven

Call Signs and City of License of All Translators (attach list):

<u>Translator Frequency</u>	<u>Translator Call Sign</u>	<u>City of License</u>	<u>County of License</u>
91.9	K220AV	Taos	Taos
91.9	K220AW	Las Vegas	San Miguel
91.9	K220EL	Socorro	Socorro
91.9	K220EM	Dzilh-Na-O-Dith-Hle	San Juan
91.1	K216CU	Cuba	Rio Arriba
91.1	K216CT	Eagle Nest	Colfax
91.1	K216AL	Arroyo Seco	Taos

Estimated Population Served by All Translators: 50,025 over 2,936 square kilometers of combined service areas. Average population density is 17.04 persons per square kilometer.

Population Breakout calculation based upon the 60 dBu (1mV/m) "service" contour for all facilities.

Population Data is Census 2000 data for Com Study v2.2 by RadioSoft.

Are any of your translators "daisy chained" (ie., one feeding another): Yes, Arroyo Seco feeds the Taos transmitter (Taos serves 13,581 (27%) of the total translator population given above).

How Many of Your Translators Serve Rural Communities: All are classified as rural under CPB guidelines.

How Many Translators Were Constructed with Federal Financial Assistance: All

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? All. All continue to be serviced and maintained by private donations to KUNM. No state or local governmental funds were/are used for our translators.

What factors prompted your decision to construct these translators? New Mexico is a very rural and very poor state. All translators were built at request of communities. Our main station is more than a mile above average terrain and covers an approximate 60 mile radius from Albuquerque. Rural citizens drive in and out of our signal and requested our service. We believe that a root cause of poverty is access to public service media and are fully committed to our rural communities.



## **Western North Carolina Public Radio, Inc.**

WNCPRI operates six translators and has active construction permits for three more. Because of the low power authorization of our main transmitter (WCQS in Asheville) and its inability to cover all of Western North Carolina, WNCPRI must employ translators to get our signal over and around the mountains of Western North Carolina and onto the ground where the populations reside. These translators are not satellite-fed. They are fed terrestrially - two by microwave and four by off-air repeat of WCQS or WFQS (and the three CP sites will be fed off air as well). While technically these translators are "secondary" services, they provide the only public radio service for many listeners in our rural region - and, in some of our areas the ONLY public radio station that can be received at all.

Western North Carolina defines itself as a region - geographically, culturally and economically. WNCPRI has committed WCQS to serve this region. The station's programming reflects local activities that take place in all twelve of the westernmost counties of North Carolina. We ARE a local service in all of the communities served by our translators. The Commission must recognize in this deliberation that translators can (and do in our case) provide local service to their communities. The Commission must not relegate these existing translators to a service secondary to newly-licensed LPFM stations and subject them to having to protect LPFM signals.

Translators and LPFM services currently are considered co-equal facilities. Most of our translators are 10 watts - the same as LP10 stations and one of our translators (W237AR) is authorized at 125 watts - more than a LP100 station. From a standpoint of power, this defines that our translators provide equal or great coverage and technical service as would LPFM stations in these same communities.

WNCPRI translators are local signals that repeat a local Western North Carolina station. They also provide local public radio service to the communities that they serve. They are not satellite-fed repeats of distant signals. 159,321 (FCC coverage population count) residents of Western North Carolina receive their local public radio service from WCQS translators - some for the last eight years (W269AY in Highlands, NC); others for as long as eighteen years (W209AE in Cullowhee, NC). We strongly oppose the position of Prometheus that LPFM stations categorically be given priority over translators - especially terrestrially-fed translators that fulfill the Commission's intended purpose that translator service extend the reach of local stations.

The Commission should grant equal status to LPFM and terrestrially-fed translator applicants that can both provide local service. When both applicants can be considered as local in this respect, the Commission should not adopt any new licensing rule changes based on the class of service to resolve competing demands for spectrum. Rather, the Commission should use its current procedures for granting MX applications to resolve these disputes between mutually exclusive LPFM and translator applications.

The Commission should also provide "grandfathered" protection rights to terrestrially-fed FM translators that are currently licensed and operating, or for which construction permits have been granted. Licensees have invested significant time, finances and community goodwill to get these stations on the air. This proceeding should not negate or cancel out this investment that has only been encouraged and made possible by Commission rules, policies and actions in the past. For these same reasons, the Commission should not dismiss all pending applications for new FM translator stations and make potential refilings subject to the resolution of the licensing issues raised in this proceeding. These pending applications were also the result of local investments of time, money and community goodwill - again because of Commission rules and action. Likewise, the Commission should not dismiss pending mutually exclusive FM translator applications - especially those for which the MX parties do not include any LPFM applicants.

Finally, the Commission must recognize that many public radio translators have been funded by grants from the Public Telecommunications Facilities Program. It would be unsound national policy for one Federal agency (the FCC) to create and implement rules that would negate (and waste) a financial investment by another Federal agency (the NTIA/PTFP) - especially when both of these agencies are parts of the Department of Commerce.

The following WCQS / WFQS translators have been funded, in part, by PTFP grants. The funds that matched these PTFP grants were provided by members of the community that these translators serve:

W209AD Clyde, NC	Population Served:	33,346
W218AB Sylva, NC	Population Served:	6,662
W209AE Cullowhee, NC	Population Served:	3,171
W237AR Hazelwood, NC	Population Served:	95,748

In addition, the following WCQS / WFQS translators were funded with local community funds provided by members of the communities served by these translators:

W269AY Highlands, NC	Population Served:	3,192
W218AD Brevard, NC	Population Served:	17,202

**Licensee Santa Monica Community College District (SMCCD) Response to:  
Further Notice of Proposed Rulemaking concerning Section 73.809, LPFM stations and FM  
translator stations.**

**EXECUTIVE SUMMARY**

**Santa Monica Community College District (SMCCD)** maintains seven translator stations to extend the signals of Southern California stations **KCRW, KCRU, KCRI and KCRY**. Three of these translators provide the communities with sole public radio service.

We also feed a community-owned translator in the small desert city of **Ridgecrest**, 140 miles North East of Los Angeles. The Navy's top rated research and development facility, China Lake, is located nearby. Contributions to maintain and operate a series of TV and FM translators, including the translator that rebroadcasts KCRY's signal, are voluntary. Residents also volunteer their time to keep the operations going.

We also hold a construction permit for a translator in **Borrego Springs** which is to be fed off air via KCRI, Indio.

**KCRW**, a community service of Santa Monica College, provides more than 550,000 listeners each week with an eclectic schedule of news, locally and nationally produced music, public affairs, political analysis and cultural programs. As a member-supported, non-commercial station, its 55,000 subscribers provide KCRW with the largest single source of financial support. KCRW's programming reflects the diversity of the community it serves. KCRW is National Public Radio's Southern California flagship station. KCRW also produces six national programs and award-winning literary and drama programs from its studios on campus in Santa Monica..

KCRW's innovative and acclaimed programming has been recognized with significant press coverage in Los Angeles and around the country and the world. *The New York Times* recently hailed Nic Harcourt, KCRW's music director, as the most influential DJ in radio.

With 22 local programs available for podcasting, KCRW is a recognized leader in new technologies.

Nonetheless, KCRW considers its key role as that of a public service broadcaster. It values all its listeners, whether they listen on full service stations or low power translators.

**The licensee believes that if the FCC elevates the status of Low Power FM stations to a primary status in relation to translator stations, that would mean that any LPFM station could displace any translator station.**

**That could result in listeners to KCRW's program service in small, rural communities losing their translator, including the individual listener's voluntary financial investment to support the service.**

### **Details of SMCCD's Translator Service**

KCRU, Oxnard, KCRI, Indio and KCRI, Mojave originally began as translator stations establishing a listener base which could support and warrant the upgrade to primary station status. Three of the translators serve communities with no public radio service.

One of the seven operates as an LMA translator. Service was established in 2003 to serve an audience that had been listening for more than 10 years to KCRU's secondary signal. That signal now receives interference from a second channel adjacent station's IBOC signal.

SMCCD often receives calls from former listeners who relocated into neighboring parts of Southern California requesting that we serve their area. We continuously explore the option of using translators to serve these areas. It would be highly detrimental both to our existing service and our ability to serve future audiences if LPFM stations were granted primary status over translators.

Based on our experience in Goleta, it's possible that audiences now listening to our secondary service could be affected in the future by adjacent stations adding IBOC transmitters. We would then have to add more translators to reach the same audience, if we could find an available frequency.

Although we do not originate any local programs on any of the translators, our morning and afternoon newscast reporters are instructed to file stories on significant news from these areas. When significant cultural events occur, such as the Ojai Music Festival, these are listed on both our on-air calendar and on our website.

**Any interruption to our present service will have a negative effect on our financial operations. If we were forced to shut down any of our translators, it is doubtful we could find a replacement frequency in the crowded spectrum space of Southern California.**

### **Satellite Service**

KCRW operates a KU satellite stream to feed several of its translators and distant stations. The system was put in place in 1994 as a means to feed KCRI, Indio, as a cost effective method to provide a studio to transmitter link. Once in place, the foot print of the satellite service enabled KCRW to leverage its investment to serve difficult to feed sites. Gorman and Twenty Nine Palms represent two communities who would not be serviced if not for the satellite delivery of programming. Likewise over the air fed translators in Ridgecrest and Borrego Springs (when built) depend on the over the air signals of KCRI and KCRY, both of which are fed via the same satellite stream. Satellite fed translators afford us a very cost effective and reliable method of serving communities which otherwise would be not be served.

The following is a listing of SMCCD's translators with a brief summary of operations, population, and contributors to KCRW:

**K209CN**

**Gorman, CA**

Constructed March 1999

Satellite Delivered programming of KCRW

Population: **400**

(zip codes: 93243, 93225, 93222, 91310, 39532, 91384, 93040, 91354, 91383, 91350, 91380)

The service area is a rural area. There are only a few radio signals that serve these communities.

Number of contributors, past and present: **627**

Sole Public Radio service to this community: .KCRW is the sole provider for the NPR News magazines

**K210CL**

**Lemon Grove, CA**

Acquired October 2001

Satellite Delivered programming of KCRW

Population: **24,935**

(zip codes: 91913, 91914, 91902, 91908, 92139, 91910, 91921, 91947, 91915, 91911, 91909, 91912)

Number of KCRW contributors, past and present: **36**

If we were forced to shut this translator down, it is doubtful we could find a replacement frequency in the crowded spectrum space of Southern California.

**K214CR**

**Joshua Tree & Twenty Nine Palms, CA**

Constructed March, 1998

Satellite Delivered programming of KCRW

Population: Joshua Tree, **3,898**. Twenty Nine Palms, **14,764**.

(zip codes: 92278, 92252, 92277, 92284, 92285, 92286, 92268)

The service area is a rural area. There are only a few radio signals that serve these communities.

Number of contributors, past and present: **316**

Sole Public Radio service to this community; KCRW is the sole provider for the NPR News magazines in this coverage area.

**K215BA**

**Cabazon & Beaumont, CA**

Fed over the air from KCRW, Santa Monica 89.9 FM

Constructed October, 1986

Population: Beaumont **9,685**

Cabazon **1,588** The service area is a rural area. There are only a few radio signals that serve these communities.

(zipcodes 92220, 92230, 92256, 92223, 92583, 92581, 92582, 92546, 92543, 92549, 92268, 92545, 92320, 92286, 92241, 92551, 92552, 92567)

Number of KCRW contributors, past and present: **302**

SMCCD

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**K271AC**

**Ojai, CA**

Fed over the air from KCRU, Oxnard 89.1 FM

Constructed March 1997

Population: Ojai 7,613. The service area is a rural area. There are only a few radio signals that serve these communities.

(zipcodes 93022, 93023, 93024)

Number of KCRW contributors, past and present: **892**

**K272DI**

**Fillmore and Santa Paula, CA**

Fed over the air from KCRU, Oxnard 89.1 FM

Population: Santa Paula, 28,879. The service area is a rural area.

(zipcodes 93061, 93060, 93066, 93010, 93015, 93011, 93012, 93004, 93016, 93021, 93090, 93030, 93003, 91320, 93034, 93031, 93032, 91319, 91360, 91363, 93033, 93001, 93041, 93035, 93024, 93023, 93062, 93043, 93009, 93007, 93005, 93002, 93006, 91362, 93044, 93040, 93022, 93042, 91359, 91358, 93065, 93094, 93093, 91361)

Number of contributors, past and present: **5142**

**K295AH**

**Goleta, CA**

Fed over the air from KCRU, Oxnard 89.1 FM

Population: **55,000**, a metropolitan area (zip codes 93111, 93199, 93116, 93118, 93107, 93110, 93105, 93109, 93101, 93102, 93190, 93160, 93150, 93140, 93130, 93121, 93120, 93106, 93103, 93108)

Number of contributors, past and present: **1,619**

**K261AC**

**Ridgecrest, CA**

Fed over the air from KCRY, Mojave.

Population: **25,000** (zip codes 93555, 93556, 93558, 93527)

Number of contributors to KCRW, past and present: **301**

Many of these KCRW members also contribute to the Indian Wells Valley TV Booster (IWVTVB) i a not-for-profit volunteer organization that has been receiving, translating, and rebroadcasting TV and FM radio stations' signals to the IWV since about 1950. Today, many valley residents continue to support the IWVTVB so that those without satellite or cable service can receive TV and FM radio over the air. The Booster's equipment is bought and maintained with funds donated by residents of the IWV. Other residents donate their time and services to keep the equipment operating and to make improvements.

## **WPSU-FM, State College, PA**

Current translators in operation:

W284AK -- Clearfield, Pa. -- Approximate Population served: 8,400  
W294AE -- Altoona, Pa. -- Approximate Population served: 77,000  
W265BB -- Bradford, Pa. -- Approximate Population served: 11,800  
W221BD -- DuBois, Pa. -- Approximate Population served: 9,100  
W236AH -- Treasure Lake, Pa. -- Approximate Population served: 4,900

All of the translators -- save for Altoona -- serve rural areas.

We currently have a construction permit for a new translator in Huntingdon, Pa., that will serve approximately 8,100 persons. We plan to have it in operation by end of October, 2005.

We have long-term plans to add translator service in Bedford and Johnstown, Pa.

We received federal support in the form of NTIA-PTFP grants for all of our current translators. We have an NTIA grant pending for the Huntingdon facility.

There were indeed significant local capital campaigns for each of the translators.

Placing the translators in operation was a two-fold decision.

1. All the areas were unserved by any public radio service and we believe in our service mission to extend that resource.
2. The topography of Central Pennsylvania made low-power translators the only viable method to reach these population pockets.

The comments we have received from listeners --- especially after a new translator had been placed in operation -- have been most appreciative. Many whom had never heard "Morning Edition" or "All Things Considered" were very surprised and thankful that this new service was now available to them. Others, who had relocated into a rural part of our area from out of state, only to find that a public radio signal was not to be found, were even more thankful when "an old friend" was brought back to their dials.

One of the downsides of our translator network is that it is quite geographically large. While this places an extra burden on our engineering staff, we do know that the service is appreciated and valued.

### Radio Translators Licensed to Washington State University, Pullman, WA

Call Sign	Freq	City of License	License	Population	Funding Source	Local Effort
K210AE	89.9	Pullman WA	non-com'l	62,611	Local	No
K210DK	89.9	Ellensburg, WA	non-com'l	19,577	PTFP	Yes
K213DU	90.5	Goldendale, WA/The Dalles, OR	non-com'l	17,116	PTFP	Yes
K215EB	90.9	Clarkston, WA/Lewiston, ID	non-com'l	51,575	Local	Yes
K217AJ	91.3	Cashmere/Dryden, WA	non-com'l	8,022	PTFP	Yes
K219BM	91.7	Chelan/Waterville, WA	non-com'l	11,328	PTFP	Yes
K226AK	93.1	Ephrata/Moses Lake, WA	commercial	11,326	PTFP	Yes
K265DX	100.9	Enterprise, OR	commercial	4,873	Local	Yes
K272DO	102.3	Orofino, ID	commercial	4,931	PTFP	Yes
K274BK	102.7	Kamiah/Kooskia, ID	commercial	4,354	PTFP	Yes
K284BL	104.7	Bellingham, WA	commercial	41,731	Local	Yes
K222AU	92.3	Forks, WA	non-com'l	5,168	PTFP	Yes
K211AJ	90.1	Wenatchee, WA	non-com'l	79,744	Local	Yes
K212AC	90.3	Yakima, WA	non-com'l	141,647	PTFP	Yes

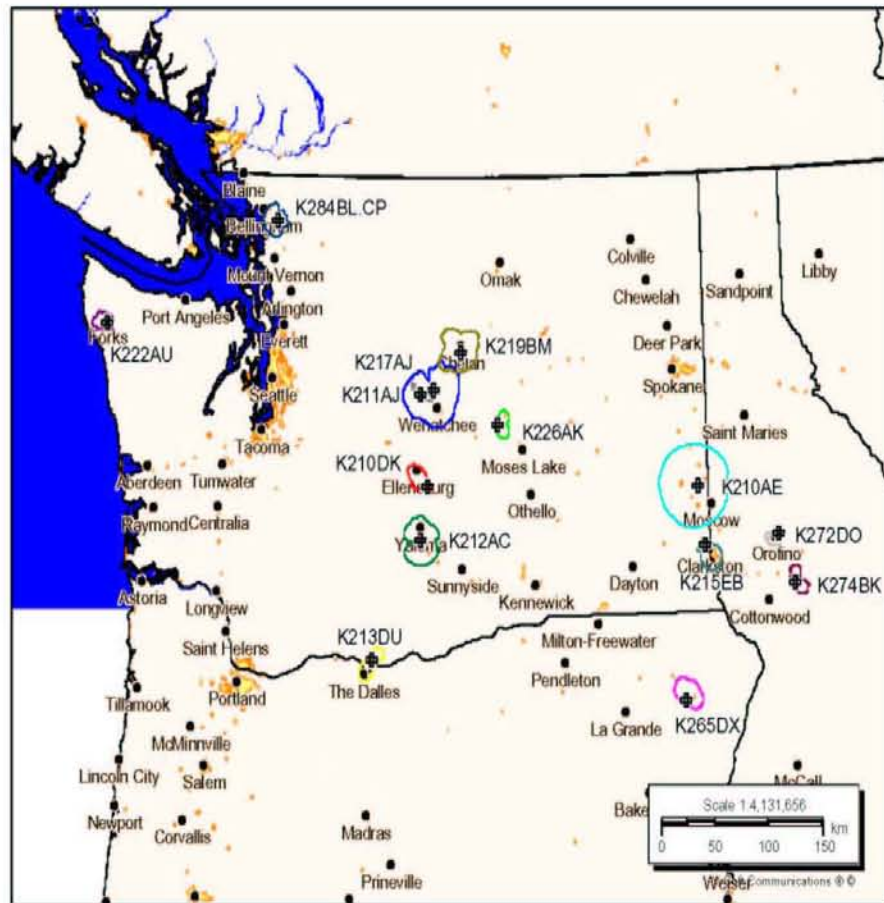
**Notes:**

denotes only public radio service

denotes construction permit

All translators serve rural communities that would not be able to fund and/or operate a public radio station/service.





## MINNESOTA PUBLIC RADIO

Station Call Sign: Minnesota Public Radio (network)

Number of Main Stations: 37 primary stations

Number of Translators: 19 translator station on the air currently; 5 more translators to be built within the next several months

Call Signs and City of License of All Translators (attach list): see below list

Estimated Population Served by All Translators: Unavailable

Are any of your translators "daisy chained" (ie., one feeding another): no

How Many of Your Translators Serve Rural Communities: per CPB metrics, all are rural

How Many Translators Were Constructed with Federal Financial Assistance: 7

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns?: All. State of MN appropriations used as well.

What factors prompted your decision to construct these translators?

In the case of some translators, the purpose is to provide a fill-in service for the community of license in areas of the community that are unserved by the primary station due to terrain/geography. In other cases, the purpose is to provide service to a rural community not served otherwise served by our public radio network.

Our listeners who receive our service via translators often contact with us with positive comments about our service. We recently put a new translator on the air in a small town in Minnesota. A city development official sent us an email saying "We thank you for this investment in our community. Minnesota Public Radio has increased the quality of life in our state through excellent programming."

In another community, for awhile this winter it appeared that we might lose our transmitter site due to the renovation of the building our transmitter was on. Listeners responded when they heard the translator might go off the air. Sample comments are "Many of us appreciate the programming, a strong signal and the special place it has in our Minnesota culture". Another writer said "We love Minnesota Public Radio and wouldn't consider living in a location where we wouldn't get it!".

List of MPR translator stations

Primary Station	Call Sign	Frequency	FCC Facility ID No.	Community
KGAC	103.9 FM	K280EB	42950	Albert Lea, MN
KSJR	90.9 FM	K215BL	42971	Alexandria, MN
KLSE	103.3 FM	K277AD	42979	Austin, MN
KGAC	92.3 FM	K222BA	141797	Blue Earth, MN
KNGA	101.9 FM	K270AQ	141824	Blue Earth, MN
WSCN	101.7 FM	W269AC	42968	Ely, MN
WIRR	89.5 FM	K208CR	86095	Ely, MN
KCRB	104.1 FM	K281AB	42969	Grand Rapids, MN
WSCN	107.3 FM	K297AD	42964	Grand Rapids, MN
KWRV	101.1 FM	K266AV	141769	Hailey, ID - CP, but not built
WSCD	93.1 FM	W226AY	141839	Hinckley, MN – CP, but not built
WSCN	97.5 FM	W248AS	141828	Hinckley, MN – CP, but not built
KSJN	104.5 FM	K283AN	141856	Hinckley, MN – CP, but not built
KNOW	106.5 FM	W293AV	141860	Hinckley, MN – CP, but not built
WGGL	92.7 FM	W224AO	42928	Houghton, MI
KCRB	97.7 FM	K249BK	42973	International Falls, MN
KNBJ	88.1 FM	K201CN	42936	International Falls, MN
KLSE	88.1 FM	K201BW	42952	La Crescent, MN
KGAC	105.7 FM	K289AE	42948	Owatonna, MN
KNGA	103.9 FM	K280EC	42961	Owatonna, MN
KQMN	90.9 FM	W215AI	42942	Roseau, MN
KNTN	100.7 FM	K264AR	141704	Roseau, MN
KLSE	101.9 FM	K270AB	42978	Winona, MN
KZSE	107.3 FM	K297AH	42907	Winona, MN

**KUFM, Missoula, MT**

Station Call Sign: KUFM

Number of Main Stations: Five

Number of Translators: Six

Call Signs and City of License of All Translators (attach list):

K218AI – Missoula, MT

K252AD – White Sulphur Springs, MT

K216BE – Swan Lake, MT

K219BN – Whitefish, MT

K219CS – Dillon, MT

K296BI – Marysville, MT

Estimated Population Served by All Translators: 25,000

Are any of your translators “daisy chained” (ie., one feeding another): No

How Many of Your Translators Serve Rural Communities: Five

How Many Translators Were Constructed with Federal Financial Assistance: None

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? Three

What factors prompted your decision to construct these translators?

Local requests for public radio service.

**KAZU-FM, Pacific Grove, CA**

1. Calls Signs and Locations of your Translator Stations AND whether they serve RURAL or METRO areas: METRO
2. Estimated population served by your Translators: 6,000
3. Any maps showing your translator coverage No maps
4. Whether or not you received federal or state funding for your translators.  
PTFP pending
5. Whether or not there was a "local" capital campaign for your translator. YES
6. Why your organization decided to make the investment in translator stations (i.e., what prompted your decision). Potential listener request
7. Any stories or anecdotal evidence about your translator listeners that you think would be helpful in showing the public interest benefits of your translator service. Just requests for our service

## **WBNI-FM, Orland, IN**

Station Call Sign: WBNI-FM 91.3; Orland, IN (Northeast Indiana Public Radio, Inc. is licensee)

Number of Main Stations: 1

Number of Translators: 1

Call Signs and City of License of All Translators (attach list): W204BF; Fort Wayne, IN (88.7 mhz)

Estimated Population Served by All Translators: 280,900

Are any of your translators "daisy chained" (ie., one feeding another): No

How Many of Your Translators Serve Rural Communities: 0

How Many Translators Were Constructed with Federal Financial Assistance: 0

How Many Translators Were Constructed Pursuant to Local Fundraising Campaigns? 1

### What factors prompted your decision to construct these translators?

Over the past 20 years, the needs and interests of northeast Indiana listeners have continued to grow beyond the ability of one station's weekly program service. After conducting thorough research and exploration, trustees and station staff agreed that an additional channel for program distribution be pursued, one that could add focus to meeting community needs efficiently while retaining the governance and operational structure that has garnered past growth. The challenge was finding the means to bring a second service to the greater Fort Wayne area given the lack of new full service channel availability for which to apply.

In 1999, NIPR Inc. filed with the FCC to construct a second station that would originate its programming on 91.3 MHz from a tower site at Orland, Indiana, with an antenna height of 300 feet and a transmission power of 2,000 watts. The signal would be retransmitted on a translator in Fort Wayne, Indiana area on 88.7 MHz from the NIPR tower site, with an antenna height of 600 feet and a transmission power of 10 watts.

NIPR's has used this arrangement of full service plus translator frequency since 2002 to more completely address and strategically satisfy the expressed desire for more of the music that remains unavailable elsewhere on the FM dial. With a full service music station joining an equally developed news and information station, the mission of NIPR, Inc. has been more effectively and productively achieved.

Please provide any stories or anecdotal evidence about your translator listeners that you think would be helpful in showing the public interest benefits of your translator service.

WBNI 88.7/91.3 offers classical music 24-hours a day across the week. This is a first for northeast Indiana and a rarity in what has become a competitive radio environment in the United States. "We know that our listeners appreciate classical music and this allows us to give them a 24-hour music service of the highest possible quality," says GM Bruce Haines. The programming includes *In the Spotlight*, which features local performances, plus music and conversation with international artists on *Saint Paul Sunday* and *Harmonia*, a weekly offering produced in cooperation with Indiana University's world-renowned Early Music Institute.

Arbitron figures from Spring 2005 show WBNI's weekly TSA cume audience increasing to 17,200 from 14,600 in Fall 2004. Over that same time, TSA AQH increased from 500 to 1,400 and time spent listening more than doubled – 10.3 hrs/week (Spring 05), from 4.3 hrs/week (Fall 04). Nearly 200 new members pledged for the programming heard on WBNI in 2004, which is an estimated \$24,000 in new membership support for the classical program service.

The public service provided with the full service plus translator frequency combination is clearly evident.

August 19<sup>th</sup> 2005

Margaret Miller  
Dow, Lohnes & Silbertson PLLC  
1200 New Hampshire Ave., NW Suite 800  
Washington DC 20036

Dear Ms. Miller:

I am responding to an e-mail that we received from Georgette Bronfman, Executive Director of Eastern Public Radio, concerning our translator network.

I have gathered as much information as possible on the population count, but was not sure what constitutes a Rural or Metropolitan area. As a non-commercial station, the primary contour is considered to be your 60 dBu, but the listener ship extends well beyond that. I considered just listing that contour, but decided to supply you with the numbers out to our 54 dBu.

			Pop. 60 dBu	54 dBu
1)	K216FW	Steamboat Springs CO	10,620	12,455
2)	W224AU	Allentown PA	149,049	236,438
3)	W226AA	Easton PA	88,341	102,156
4)	W230AA	Atlantic City NJ	64,779	102,803
5)	W245AC	Harmony Twp. NJ	30,698	63,312
6)	W289AA	Lebanon Twp. NJ	21,212	44,048
7)	W300AC	Chattsworth NJ	3,876	4,501

I have also attached maps from the FCC web site the Tiger Census Maps showing the 60 dBu contours.

Although WWFM The Classical Network is licensed to the Mercer County Community College board of Trustee's, there were no State or Federal grants used in the construction of the network. All funds came directly out of the station's operating capital.

WWFM began broadcasting in 1982 from 6 AM until midnight, with a format split between classical music and jazz. We soon realized that our audience was more interested in a high quality classical music format and we decided to drop the jazz. A few years later we went to a 24 hour broadcast schedule.

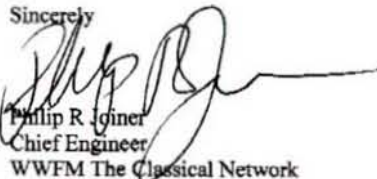


The New Jersey area was serviced by four stations that broadcasted classical music and none were located within the state itself. They were located either in New York City or Philadelphia. Two of them were commercial broadcasters and did not supply the type of classical music we found the public was interested in. Neither the New York public station or the commercial station reached the central New Jersey area well and the Philadelphia public station changed their format to "talk radio". Philadelphia's commercial station was eventually bought out and went to a rock format. We decided to build a translator network to supply the public with a full array of classical music that wasn't limited with commercial interruption. Our first translator started in Philadelphia and the network expanded from there.

We eventually built another full service station and decided to feed it by satellite. That action caused something we didn't expect. We received a call from two groups in Colorado that had lost their classical music. The full service station that was feeding them changed to a rock format. We took ownership of two of their non-commercial translators and became their new source for classical music. We were inundated with calls for program guides as soon as we started broadcasting and in no time developed a devoted listener ship. As happens with translator networks, we lost one of the translators in Colorado to a new full service station which put us within their protected contours. This unfortunately has also happened in Philadelphia Pa and in Long Branch NJ as well. The stations that caused us to turn off were not formatted with classical music, but either rock, oldies or other type of programming.

We were again inundated with calls in all three instances, but for all the wrong reasons. Classical music has an audience that is highly devoted. Although some listeners are of the younger generation, I have found most to be 50 years of age or older. Allot are senior citizens that spend their day at home as shut-ins. When there is a problem with a translator, they are on the phone looking for me to let me know about it. I hear stories of how we are the "lifeline" that keeps them going. The one thing that makes their day tolerable. These translators are important to them. Changes to the LPFM regulations will effect these listeners and possibly cause them to loose the one thing that helps them get through the day. Thank you.

Sincerely



Philip R. Joiner  
Chief Engineer  
WWFM The Classical Network

## Service Area Map

<http://www.fcc.gov/fcc-bin/FMTV-service-area?x=FX10...>


### General Information about the FM and TV Service Area Maps

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Please send comments via standard mail to the Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, S.W., Washington, D.C., 20554. Questions can also be answered by calling the FCC's National Call Center, toll free, at 1-888-Call FCC (1-888-225-5322).

Federal Communications  
Commission  
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Washington, DC 20554  
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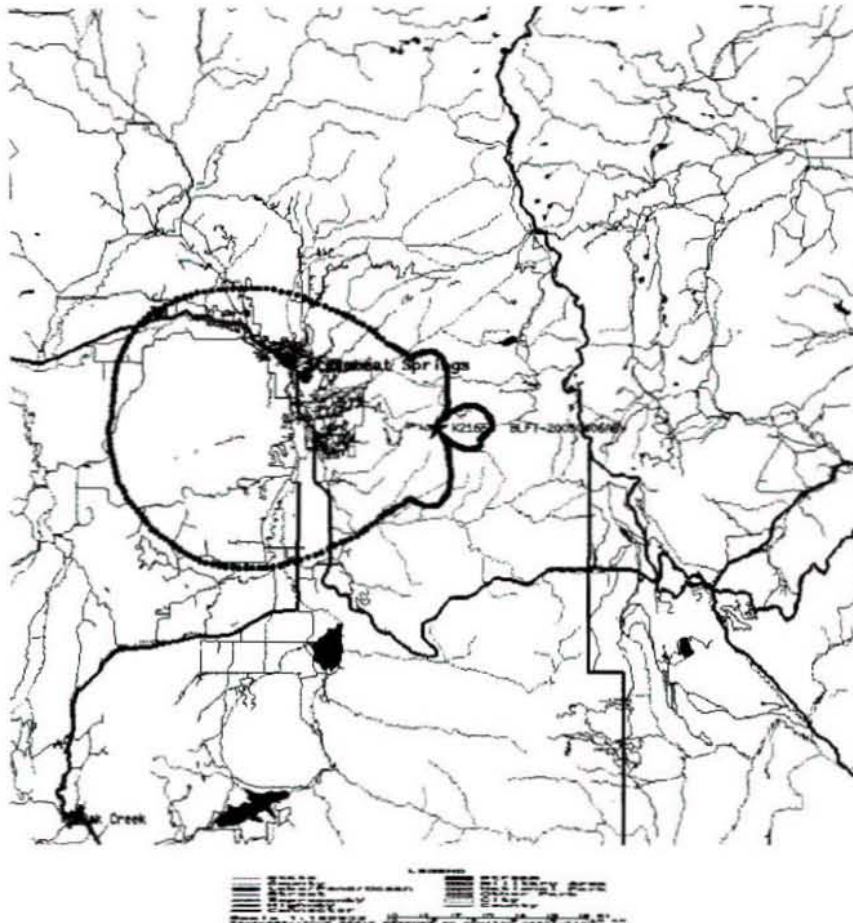
Phone: 1-888-CALL-FCC  
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(1-888-835-5322)  
Fax: 1-866-418-0232  
E-mail: [fccinfo@fcc.gov](mailto:fccinfo@fcc.gov)

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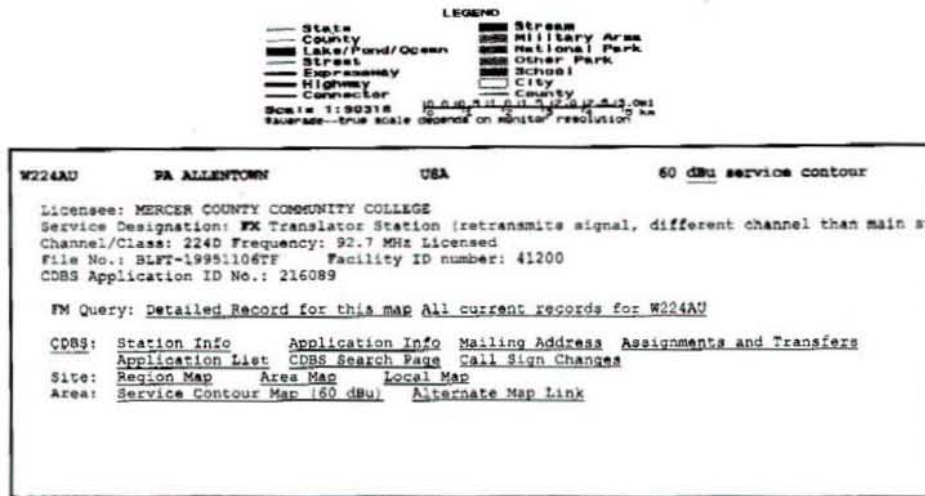
Service Area Map

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and TV Service Contour Maps**

FM

[\(202\)-418-2700](#)[FCC > MB > Audio Division - Video Division](#)[FM Query](#)[TV Query](#)**Service Area on a Tiger Census Map**

## Service Area Map

<http://www.fcc.gov/fcc-bin/FMTV-service-area?x=FX21...>


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## Audio and Video Divisions and TV Service Contour Maps

FM

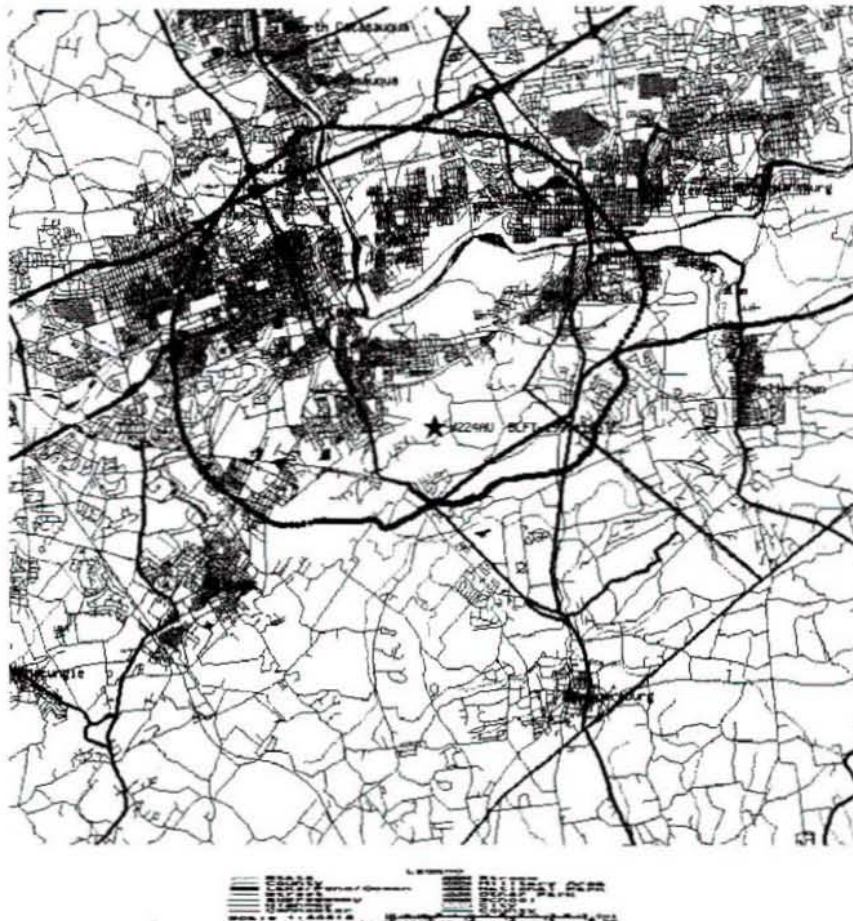
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### Service Area on a Tiger Census Map



## Service Area Map

<http://www.fcc.gov/fcc-bin/FM/TV-service-area?x=FX17...>


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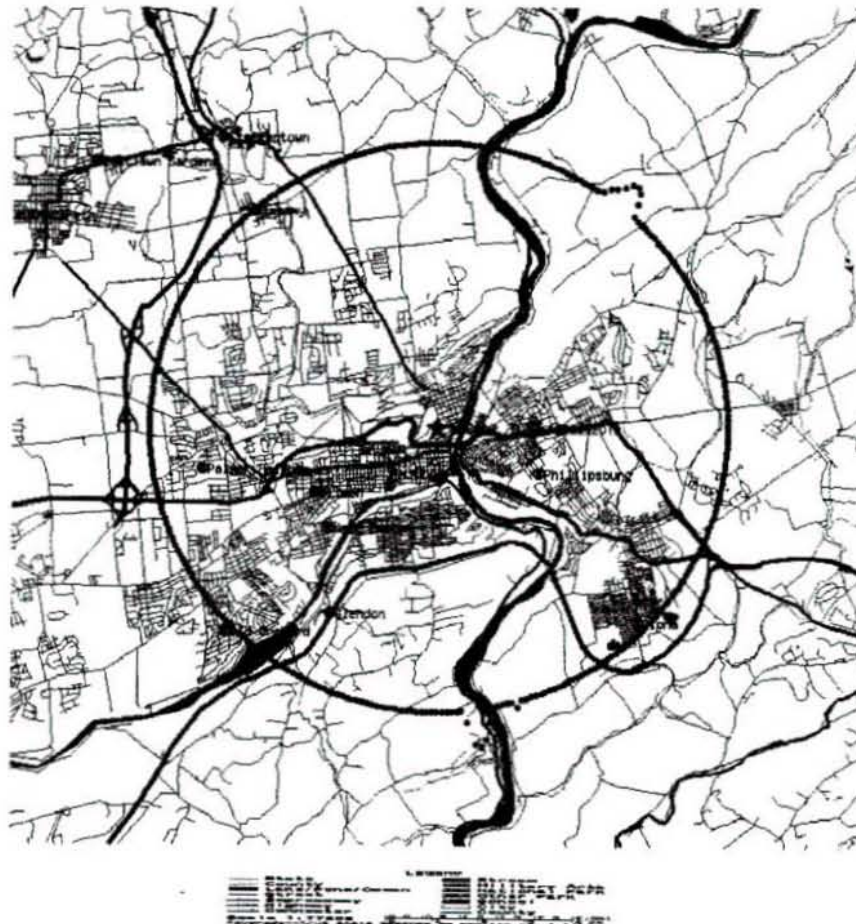
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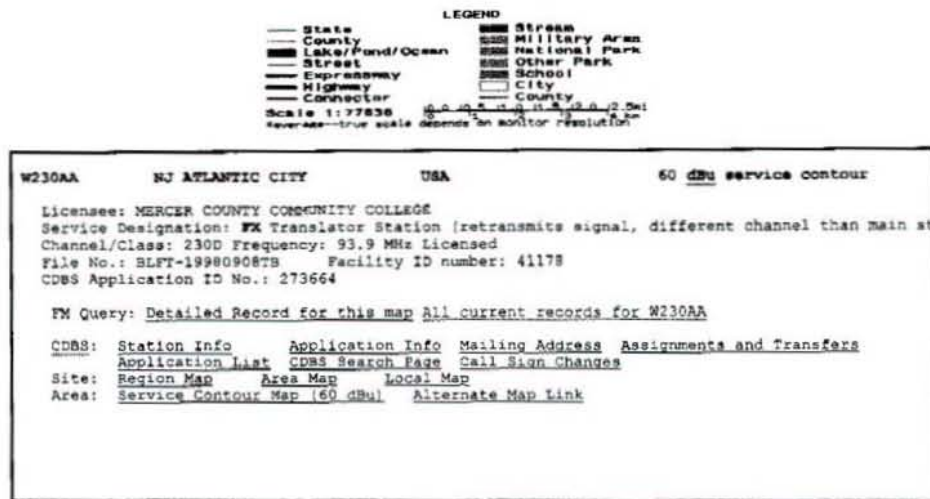
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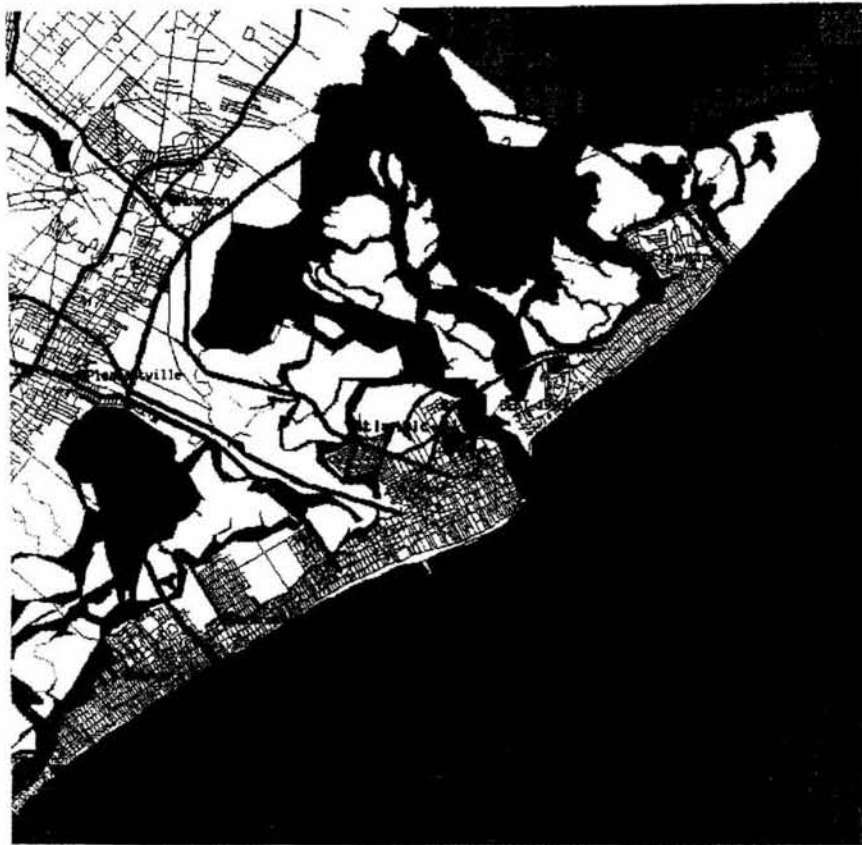
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**Service Area on a Tiger Census Map**



Service Area	Distance	Direction
1	1.0	N
2	1.0	N
3	1.0	N
4	1.0	N
5	1.0	N
6	1.0	N
7	1.0	N
8	1.0	N
9	1.0	N
10	1.0	N

Service Area Map

<http://www.fcc.gov/fcc-bin/FMTV-service-area?x=FX22...>

W245AC	NJ HARMONY TOWNSHIP	USA	60 dBu service contour
Licensee: MERCER COUNTY COMMUNITY COLLEGE Service Designation: <b>FX</b> Translator Station (retransmits signal, different channel than main st. Channel/Class: 245D Frequency: 96.9 MHz Licensed File No.: BLFT-199605097E Facility ID number: 41196 CDBS Application ID No.: 224581			
FM Query: <a href="#">Detailed Record for this map</a> <a href="#">All current records for W245AC</a>			
CDBS: <a href="#">Station Info</a> <a href="#">Application Info</a> <a href="#">Mailing Address</a> <a href="#">Assignments and Transfers</a> <a href="#">Application List</a> <a href="#">CDBS Search Page</a> <a href="#">Call Sign Changes</a>			
Site: <a href="#">Region Map</a> <a href="#">Area Map</a> <a href="#">Local Map</a>			
Area: <a href="#">Service Contour Map (60 dBu)</a> <a href="#">Alternate Map Link</a>			

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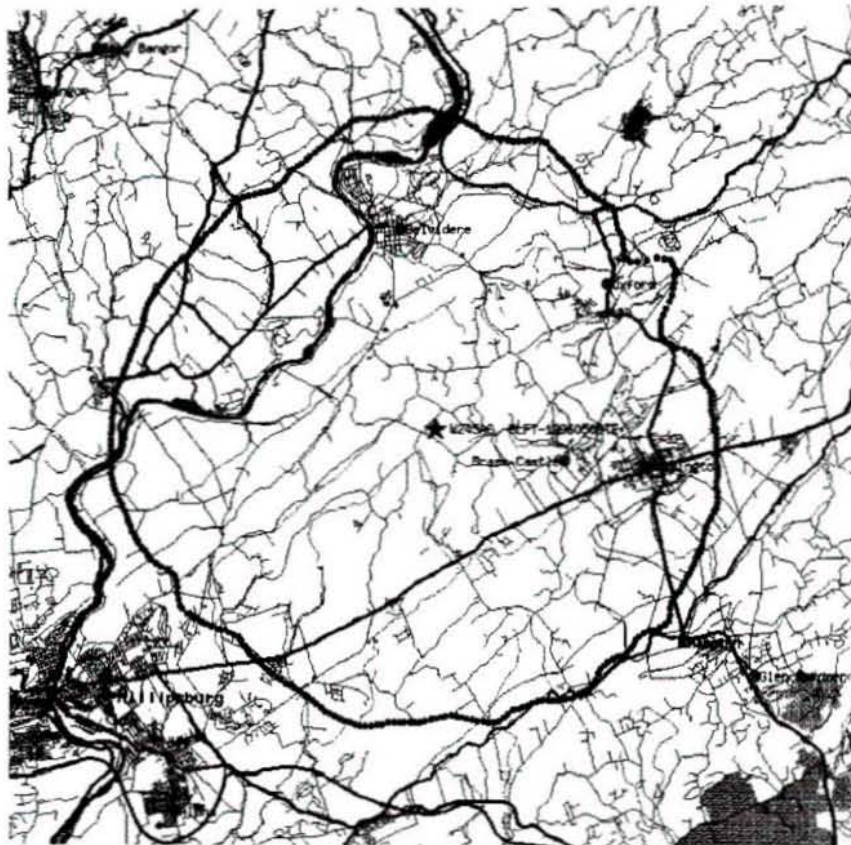
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FM Query

### TV Query

### Service Area on a Tiger Census Map



## Service Area Map

<http://www.fcc.gov/fcc-bin/FMTV-service-area?x=FX19...>

LEGEND

State	Stream
County	Military Area
Lake/Pond/Ocean	National Park
Street	Other Park
Expressway	School
Highway	City
Connector	County

Scale 1:50000  
 Several true scale depends on monitor resolution

W289AA	NJ LEBANON TOWNSHIP	USA	60 dBu service contour
Licensee: MERCER COUNTY COMMUNITY COLLEGE Service Designation: FM Translator Station (retransmits signal, different channel than main st. Channel/Class: 289D Frequency: 105.7 MHz Licensed File No.: SLT-19931206TA Facility ID number: 41179 CDBS Application ID No.: 192706			
FM Query: <a href="#">Detailed Record for this map</a> <a href="#">All current records for W289AA</a>			
CDBS: <a href="#">Station Info</a> <a href="#">Application Info</a> <a href="#">Mailing Address</a> <a href="#">Assignments and Transfers</a> <a href="#">Application List</a> <a href="#">CDBS Search Page</a> <a href="#">Call Sign Changes</a>			
Site: <a href="#">Region Map</a> <a href="#">Area Map</a> <a href="#">Local Map</a>			
Area: <a href="#">Service Contour Map (60 dBu)</a> <a href="#">Alternate Map Link</a>			

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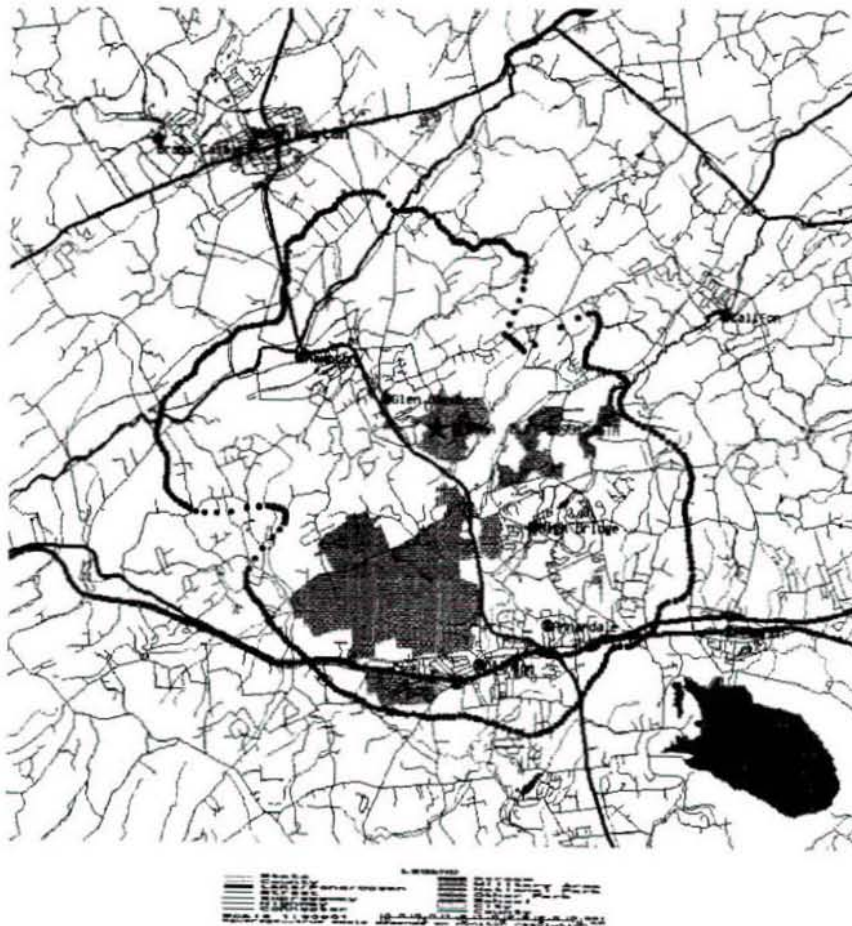
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FM Query

### TV Query

FM

### Service Area on a Tiger Census Map



Service Area Map

<http://www.fcc.gov/fcc-bin/FMTV-service-area?x=FX18...>

W300AC	NJ CHATEAUX, ETC.	USA	60 dBu service contour
Licensee: MERCER COUNTY COMMUNITY COLLEGE			
Service Designation: <b>FX</b> Translator Station (retransmits signal, different channel than main station)			
Channel/Class: 300D Frequency: 107.9 MHz Licensed			
File No.: BLFT-19930806TD Facility ID number: 41191			
CDBS Application ID No.: 188915			
FM Query: Detailed Record for this map All current records for W300AC			
CDBS:	<a href="#">Station Info</a>	<a href="#">Application Info</a>	<a href="#">Mailing Address</a>
	<a href="#">Application List</a>	<a href="#">CDBS Search Page</a>	<a href="#">Assignments and Transfers</a>
Site:	<a href="#">Region Map</a>	<a href="#">Area Map</a>	<a href="#">Local Map</a>
Area:	<a href="#">Service Contour Map (60 dBu)</a>	<a href="#">Alternate Map Link</a>	

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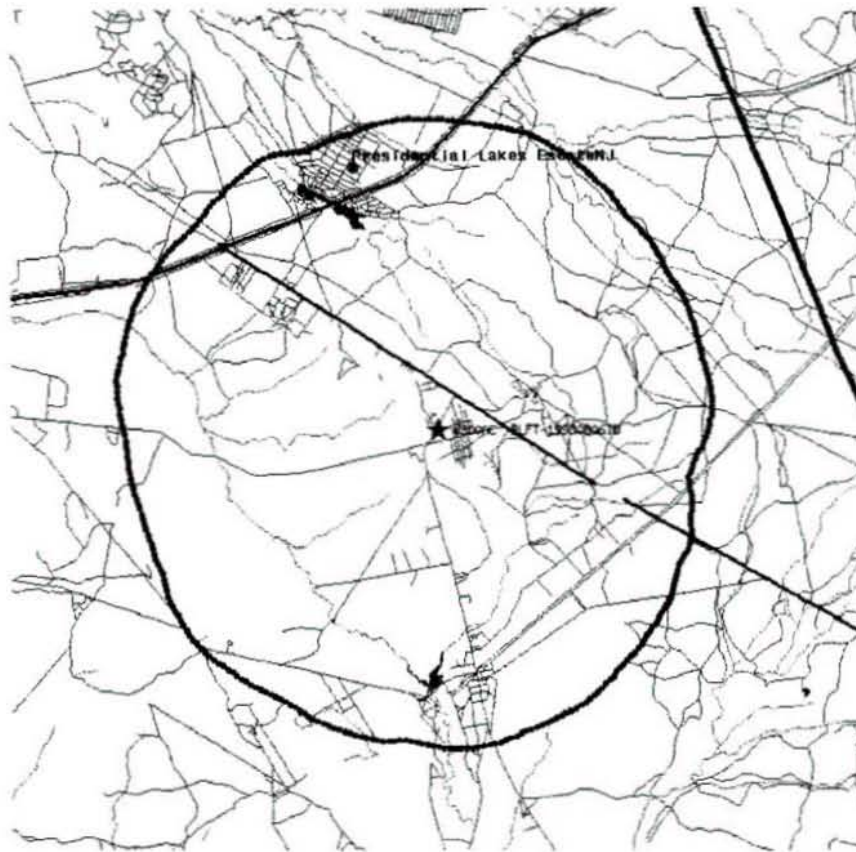
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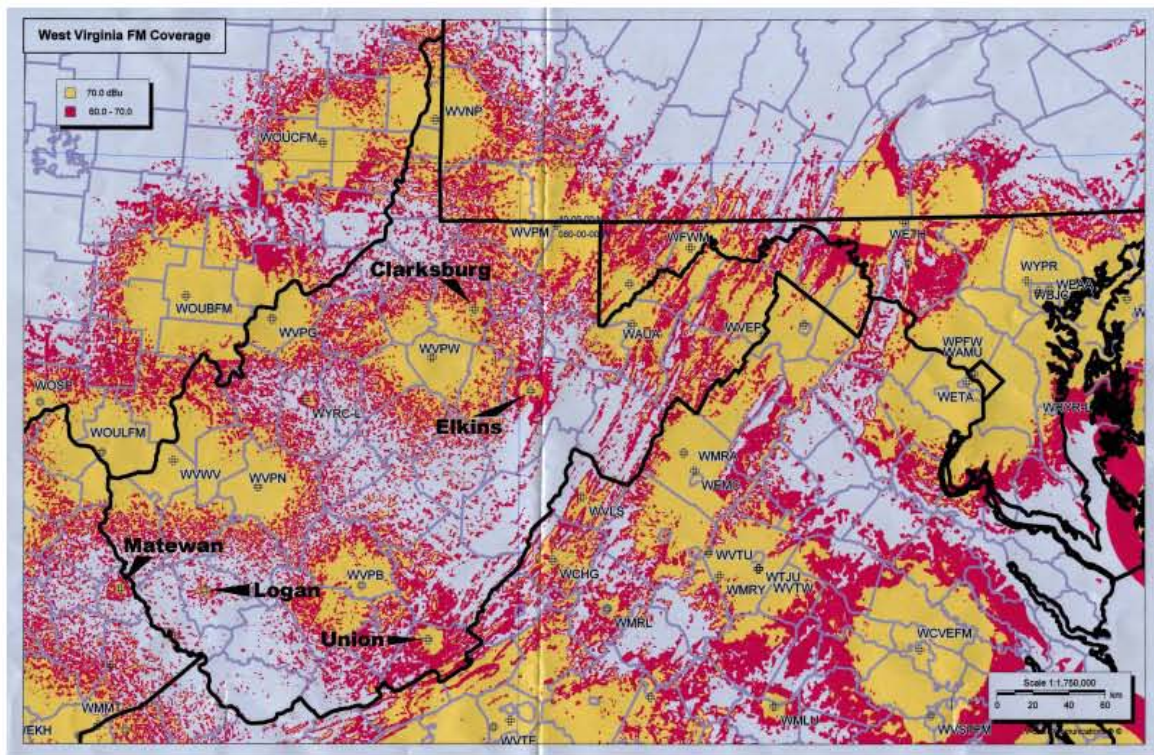
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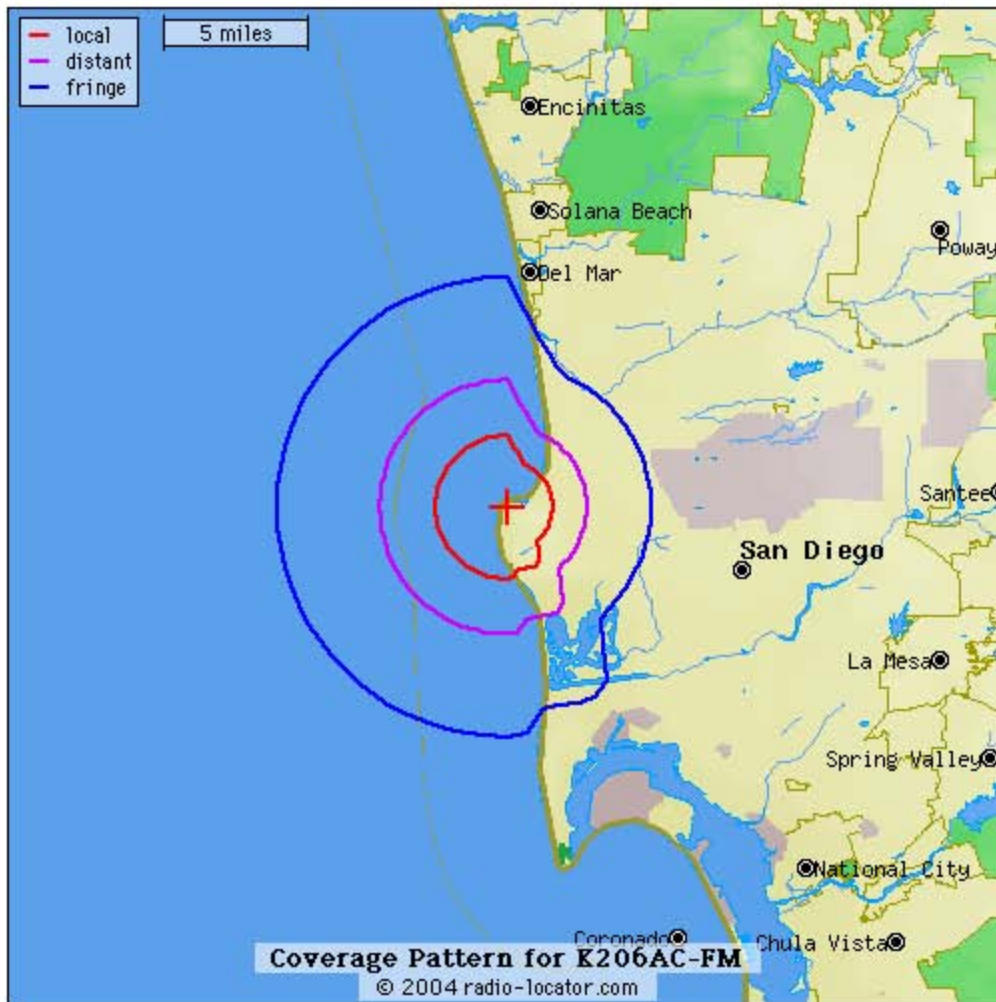


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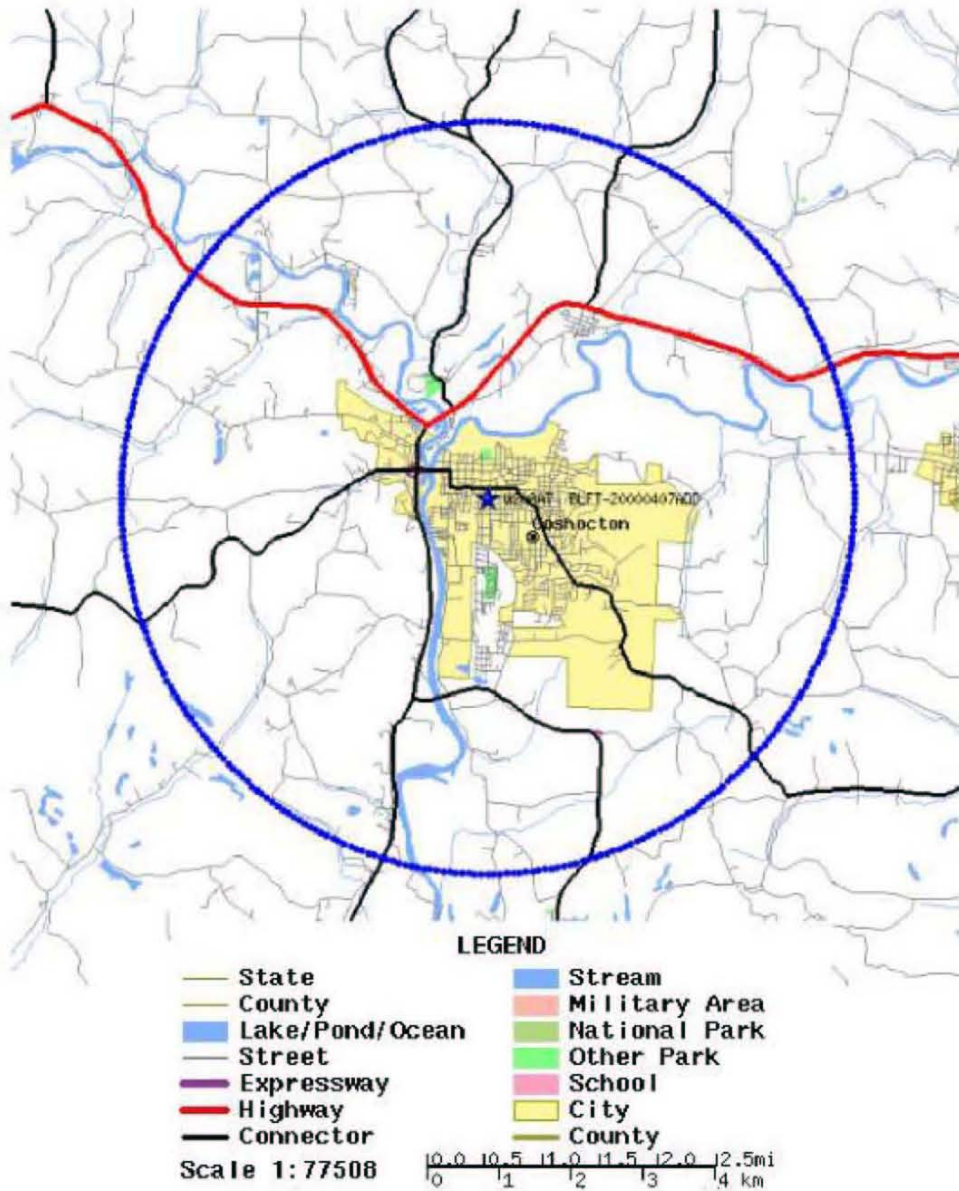


**Predicted coverage pattern for K206AC 89.1 FM, San Diego, CA**



# W208AT, Coshocton, Ohio

60 dBu Service Contour







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Predicted coverage pattern for W208AP 89.5 FM, Lynchburg, VA



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Predicted coverage pattern for W209AA 89.7 FM, Charlottesville, VA



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Predicted coverage pattern for W209AG 89.7 FM, Roanoke, Etc., VA



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**Predicted coverage pattern for W211BE 90.1 FM, Lebanon, VA**



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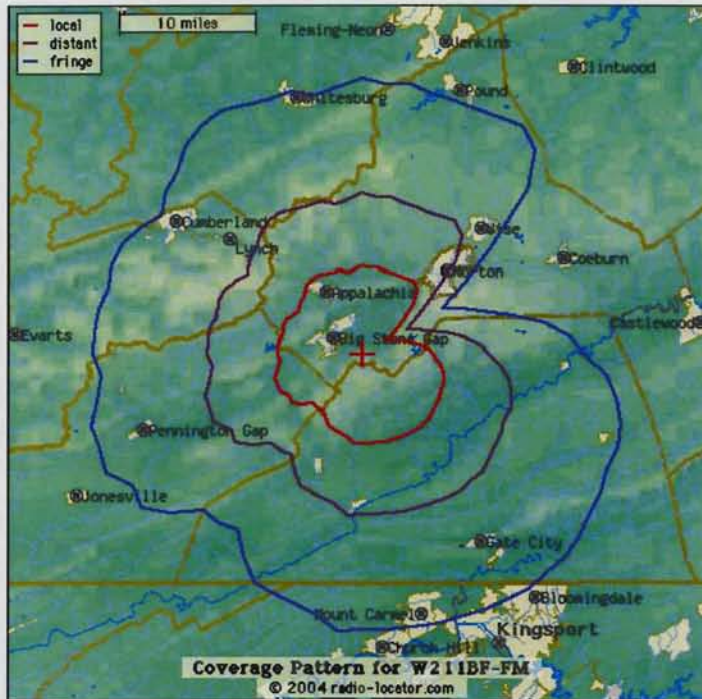
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## Predicted coverage pattern for W211BF 90.1 FM, Big Stone Gap, VA



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### Predicted coverage pattern for W212BP 90.3 FM, Clintwood, VA



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## Predicted coverage pattern for W215BJ 90.9 FM, Saint Paul, VA



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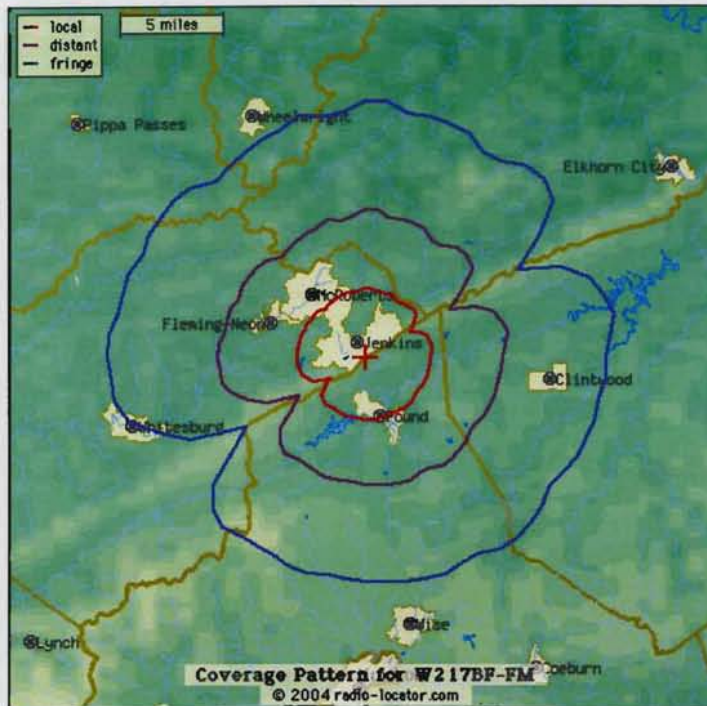
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### Predicted coverage pattern for W217BF 91.3 FM, Pound, VA



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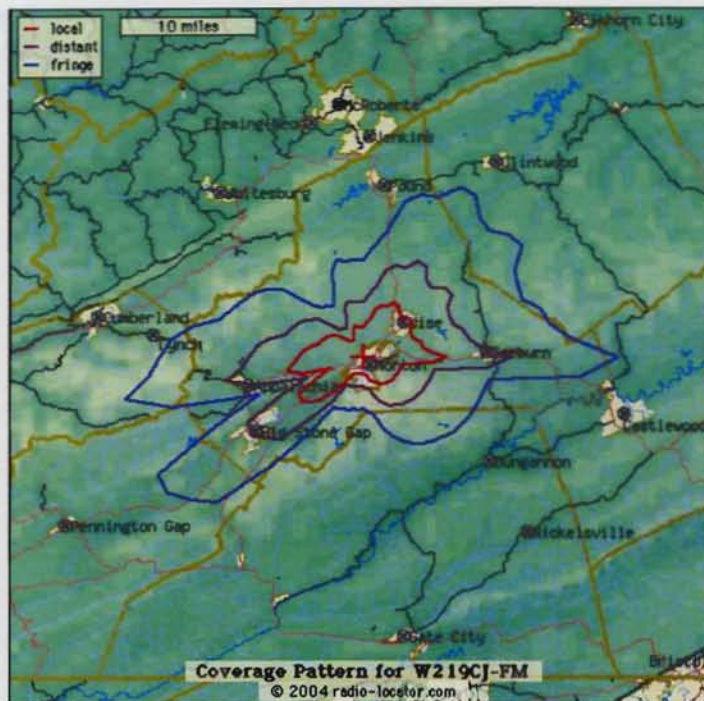
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## Predicted coverage pattern for W219CJ 91.7 FM, Norton, VA



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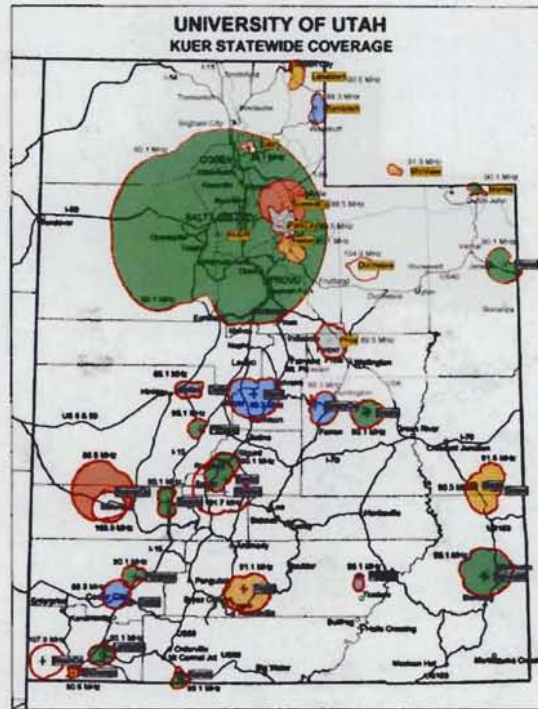
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